

S42A Appendix 2 - HS3 Climate Change - Climate Resilience and Nature Based Solutions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S30.0123	Porirua City Council	General comments - consideration policies	Oppose	Council opposes all "consideration" policies since they often duplicate or conflict with "regulatory" policies, and represent regulatory overreach without sufficient s32 evaluation or other evidence. We consider that they will create unnecessary regulatory costs due to the way they are drafted. They assume a level of knowledge and expertise on a range of matters generally not available to consent authorities, and in some cases represent a transfer of s31 functions to territorial authorities.	Not stated.		Reject
S140.002	Wellington City Council (WCC)	General comments - consideration policies	Support in part	The title of the regulatory policies as 'consideration' policies set out in chapter 4.2 creates confusion for their statutory weighting and should be amended.	Amend the wording of the title of the regulatory policies as outlined in Chapter 4.2 from 'Consideration' to 'Give particular regard'.		Reject
S158.001	Kāinga Ora Homes and Communities	General comments - consideration policies	Oppose	Considers that all of the policies in Chapter 4.2 have been worded to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria). Seek that all policies directing matters of consideration for resource consent are deleted from the regional policy statement in full.	That Chapter 4.2 is deleted from the regional policy statement in full. OR In the alternative that this relief is not granted, seek that the policies are reworded to state the intended outcome such that regional and district plans giving effect to the regional policy statement are suitably informed of the desired outcomes to address identified resource management issues.		Accept in part
FS6.013	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	General comments - consideration policies	Oppose	We oppose this submission because this chapter gives effect to the National Policy Statement on Urban Development and the National Policy Statement for Freshwater Management. This chapter has important provisions in relation to Te Mana o te Wai, mana whenua/ tangata whenua roles and values and mātauranga Māori.	Disallow		Accept in part
FS3.032	Waka Kotahi NZ Transport Agency (Waka Kotahi)	General comments - consideration policies	Support in part	WK supports submission in part and also seeks clarification as to the intent and implementation of this policy.	Not stated	Waka Kotahi seeks clarification as to the intent and implementation of this policy.	Accept
FS20.031	Ātiawa ki Whakarongotai Charitable Trust	General comments - consideration policies	Oppose	Ātiawa strongly oppose the submission point, it would be inappropriate to delete Chapter 4.2, the chapter contains important strategic policy direction to plan users on how te taiao must be managed, in accordance with Te Tiriti o Waitangi, the RMA, national policy and other statutory direction.	Disallow		Accept in part
S158.044	Kāinga Ora Homes and Communities	General comments - consideration policies	Not Stated / Neutral	Considers that a number of policies have been worded within the chapter to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria).	Seek that Chapter 4.2 is deleted from the regional policy statement in full, however seeks that Policy UD.3 is retained with		Reject

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					amendments and relocated to Chapter 4.1.		
FS6.014	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	General comments - consideration on policies	Oppose	We oppose this submission because this chapter gives effect to the National Policy Statement on Urban Development and the National Policy Statement for Freshwater Management. This chapter has important provisions in relation to Te Mana o te Wai, mana whenua/ tangata whenua roles and values and mātauranga Māori.	Disallow		Accept
S165.060	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	General comments - consideration on policies	Oppose in part	Submission in reference to Chapter Introduction and Table of Contents Chapter 4.2. The introduction (above the table) incorrectly states the weight to be given to the chapter's policies when changing or varying regional and district plans. Those plans must give effect to the RPS, not have particular regard to the RPS' provisions.	This section contains the policies that need to be given particular regard, where relevant, when assessing and deciding on resource consents or notices of requirement. <b>The policies must be given effect to</b> or when changing, or varying district or regional plans. Within this section, policies are presented in numeric order, although the summary table below lists the policy titles by topic headings.		Accept
FS30.319	Beef + Lamb New Zealand Ltd	General comments - consideration on policies	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
FS25.041	Peka Peka Farm Limited	General comments - definitions	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept
S30.099	Porirua City Council	General comments - definitions	Oppose	Clear and concise definitions are critical to assist in interpretation and implementation of the RPS.	Add any further definitions for any terms that are unclear and where a definition would assist in interpretation and implementation, including any relevant terms proposed		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					to be introduced in response to submissions.		
<b>FS25.132</b>	Peka Peka Farm Limited	General comments - definitions	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part
<b>FS25.115</b>	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part
<b>S11.023</b>	Outdoor Bliss Heather Blissett	General comments - overall	Support in part	Can we remove all the words information, promote, support and encourage to an action. We have been doing this for years and now is time for action. Still too passive. My local Council have been ignoring your information, promotion, support and encouragement to date. The document is far too passive.	Use stronger language throughout the document: Replace "information", "promote", "support" and "encourage" with "implement" or "incentivize" (or better word), Replace "consideration" with "essential". Replace "non-regulatory" with "regulatory".		Accept in part
<b>S16.097</b>	Kāpiti Coast District Council		Support in part	Objectives : Many objectives are not drafted clearly with regard to what outcome is sought, and some do not appear to be achievable within the scope of a regional policy statement.	Ensure all objectives are specific, state what is to be achieved where and when, clearly relate to (or state) an issue, and can be determined through implementation and monitoring whether the objectives have been met. Delete all objectives that are not achievable within the scope of a regional policy statement (with respect to legal justification, and the effectiveness and efficiency in light of alternative methods outside of the regional policy statement).		Accept in part
<b>S16.0100</b>	Kāpiti Coast District Council	General comments - overall	Oppose	Inappropriate use of verbs within objectives and policies: There are a number of examples throughout RPS Change 1 that proposes the use of verbs within objectives and policies that do not align with the RMA or relevant higher-level statutory planning documents. Council submits that the use of the correct verb in each instance is of critical importance due to their specific meaning and requirements for implementation that have been determined through case law. Council has not identified all instances of the use of inappropriate verbs, but this submission requests all verbs are reviewed and replaced where appropriate.	All verbs used in objectives and policies are reviewed and replaced with the appropriate verb in accordance with the RMA and relevant higher-level statutory planning documents.		Reject
<b>S16.0102</b>	Kāpiti Coast District Council	General comments - overall	Oppose	Use of 'and/or' throughout RPS Change 1: We note the use of and/or generally means a choice can be made. This is an issue across RPS Change 1 where it appears there is uncertainty as to whether there should	All instances of and/or are reviewed and 'and' or 'or' are specifically used where appropriate.		Accept

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				be a choice or not. We request all instances of 'and / or' are reviewed and 'and' or 'or' are specifically used where appropriate.			
<b>S16.0103</b>	Kāpiti Coast District Council	General comments - overall	Oppose	Plan-wide provisions that are based on the misconception that district plan content, decision making on resource consents or notices of requirement by the Council are not limited by legislation: There are many examples in the plan change where there is a misconception that a district plan can require certain actions or require specific changes in behaviour. There are many free-market factors that district plans cannot regulate, and therefore should be pursued by the regional council via non-regulatory methods. Examples include but are not limited to: <ul style="list-style-type: none"> <li>• Emission of greenhouse gases.</li> <li>• Transportation mode choice.</li> <li>• Restoration and enhancement activities. Nature based solutions</li> </ul>	Delete all district plan requirements where the proposed methods (including the consideration of RPS policies, district plan making, resource consents, and notices of requirement) attempt to regulate free-market activities and behaviours of individuals that are not clearly supported by the RMA or a higher-level statutory planning document.		Reject
<b>S16.0104</b>	Kāpiti Coast District Council	General comments - overall	Oppose	Explanations to objectives and policies: There are many examples where explanations to objectives and policies either contain information that is unnecessary, or content that should be included in the relevant objective or policy itself. Explanations can provide useful context in some situations, but as they have no legal status under the RMA they should be used sparingly and appropriately.	Review and amend all explanations to objectives and policies to: a. Delete those that are unnecessary; and b) Delete text that should have been included in the relevant objective or policy		Accept in part
<b>S16.0106</b>	Kāpiti Coast District Council	General comments - overall	Oppose	Provisions that are not supported by the RMA, statutory planning documents, or an evidence base that supports and justifies the proposed provisions: We have been unable to find an evidence base supporting and justifying a number of provisions in the plan change. The section 32 evaluation does not assist us in understanding the resource management basis or evidence base for many of the proposed provisions - particularly where a regulatory method is proposed.	Delete all provisions that are not supported by the RMA, statutory planning documents, or a robust evidence base that supports and justifies their inclusion in a regional policy statement.		Reject
<b>S30.0116</b>	Porirua City Council	General comments - overall	Not Stated / Neutral	The real value of regional policy statements is to provide policy direction that either does not exist at a national level or exists at a national level but needs to be articulated at a regional level. Council is concerned about the many provisions in Proposed Change 1 that either duplicate or are inconsistent with matters now comprehensively addressed by national direction. In some instances, they duplicate national direction without giving specific guidance in a Wellington Region context.	Greater alignment with National Direction		Reject
<b>FS25.033</b>	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Reject
<b>FS25.034</b>	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Reject
<b>S30.0120</b>	Porirua City Council	General comments - overall	Not Stated / Neutral	Not stated	In addition to the relief sought as set out in our submission, as outlined above Council considers that the best course of action would be to withdraw much		<b>Reject</b>

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					of Proposed Change 1, or otherwise work with councils on a variation to significantly amend most of its contents.		
<b>S34.0111</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose in part	Council has not: • undertaken a complete check of whether detailed relief sought in this submission, could be/are partly or fully addressed by other provisions in RPS PC1 • undertaken a full review of background documents and higher order documents supporting or relating to these provisions • identified all consequential amendments needed in response to relief sought on specific provisions or that might address our concerns	Seeks any and all other amendments that will address the relief sought.		Accept in part
<b>S34.0113</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose in part	Use of negative rather than neutral language in issue statements: Council is concerned the issues are worded in strong negative language in the absence of any evidence, that Council is aware of, to support this negatively framed position, and these set a negative presumption and tone for the proposed cascading provisions.	Council requests the issues are amended to be written in neutral language with a balanced approach to the issue.		Not applicable to this topic
<b>S34.0116</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Lack of higher order document or evidentiary support for provisions, and policies which duplicate national direction: Many of the proposed provisions do not appear to be adequately supported within the Section 32 Assessment by robust evidence, including any existing legislation or higher-level strategic planning document such as a national policy statement. This is particularly evident for the proposed climate change and indigenous biodiversity provisions.	Council submits that a full legal and planning review is undertaken to address these inconsistencies and seeks relief to specific provisions as identified in Table 1 below.		Reject
<b>S34.0117</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Lack of consideration of scale of provisions: The requirements and evidence base to develop the thresholds require significant effort and resourcing, which Council is not in a position to undertake, and in some cases, thresholds may not be an appropriate mechanism to address effects	Council contends that GWRC should further consider the practicalities associated with threshold-based provisions, to determine if this is the most appropriate method to achieve an objective or policy or develop guidance jointly with territorial authorities to support the development of provisions and decision-making process. Council seeks relief to specific provisions as identified in Table 1 below.		Accept in part
<b>S34.0118</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Inadequacy of Section 32 Assessment: Council is concerned that the Section 32 assessment is not sufficiently evidenced and does not fully evaluate whether many of the regulatory provisions are practical / can be achieved and are the best method of achieving the outcomes sought.	These provisions should be deleted and considered in a later plan change.		Reject
<b>S34.0120</b>	Te Kaunihera o Te Awa	General comments - overall	Oppose	Council considers that there are fundamental issues with the proposed provisions that require significant revision or deletion to ensure the RPSPC1 is legally robust and practical to implement. Thus, Council seeks	Council also seeks any other consequential amendments to remedy		Accept in part

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	Kairangi ki Uta, Upper Hutt City Council			that GWRC undertake a full legal and planning review of the proposed provisions and amend the RPSPC1 to address these concerns, including detailed submission points on individual provisions included in Table 1.	errors and address relief sought.		
<b>S32.009</b>	Director-General of Conservation	General comments - regulatory policies	Support in part	The proposed changes appropriately respond to climate change and national direction.  In particular, the promotion of indigenous over exotic species for permanent forests (Policy CC.6), and support for nature-based solutions (Policy CC.7), provide additional biodiversity benefits.	Retain as notified, except where specific changes are requested below.		Accept in part
<b>FS30.287</b>	Beef + Lamb New Zealand Ltd	General comments - regulatory policies	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
<b>S137.013</b>	Greater Wellington Regional Council (GWRC)	Highly erodible land	Support in part	Amend the definition to remove the confusion introduced by referring to two different approaches to identify areas at risk of erosion. The proposed amendment aligns with the definition for highly erodible land used by MFE and Statistics NZ to inform national erosion management policy and state of the environment monitoring, with a spatial digital layer already available.  The erosion susceptibility classification used in the National Environmental Standards for Plantation Forestry 2017 (NES-PF) was developed to inform good plantation forestry practice specifically to implement the NES-PF, rather than identifying priority areas for recovering forest cover. This classification captures only a small sub-set of highly erodible land. The RPS policy intent is to increase forest extent on a much wider area of eroding hill country.	Amend the definition as shown below:  Highly Erodible Land Means Land at risk of severe erosion (landslide, earthflow, and gully) if it does not have a protective cover of deep-rooted woody vegetation. <del>Land classified as very high (red) according to the erosion susceptibility classification in the National Environmental Standards for Plantation Forestry 2017.</del>		Accept in part
<b>S30.0105</b>	Porirua City Council	Highly erodible land	Oppose	Council opposes this definition and seeks its deletion for the following reasons:  • The first sentence requires a level of assessment and judgement inappropriate for a definition. It is unclear what a protective cover of deep-rooted woody vegetation is and how this would be determined. The second sentence is appropriately certain.	Delete definition, or amend so that it provides clear and appropriate direction to plan uses.		Accept in part
<b>FS25.021</b>	Peka Peka Farm Limited	Highly erodible land	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part

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<b>S163.0107</b>	Wairarapa Federated Farmers	Highly erodible land	Oppose	Defer to the 2024 RPS review  Further reasons set out in relation to Policy CC.6	Delete the new definition  Delete the FW icon		Reject
<b>FS7.047</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Highly erodible land	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept
<b>FS20.169</b>	Ātiawa ki Whakaron gotai Charitable Trust	Highly erodible land	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept
<b>FS29.020</b>	Ngā Hapu o Otaki	Highly erodible land	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated		Accept
<b>FS30.076</b>	Beef + Lamb New Zealand Ltd	Highly erodible land	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
<b>S79.050</b>	South Wairarapa District Council	Method CC.4: Prepare a regional forest spatial plan	Support	This method is a critical part of ensuring that the rural areas of Wairarapa do not become a carbon sink for the rest of the region.	Retain as notified		Accept in part
<b>FS14.043</b>	Masterton District Council	Method CC.4: Prepare a regional	Support	Agree with:  This method is a critical part of ensuring that the rural areas of Wairarapa do not become a carbon sink for the rest of the region	Not stated	Agree with relief sought: Retain as notified	Accept in part

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		forest spatial plan					
<b>S102.033</b>	Te Tumu Paeroa   Office of the Māori Trustee	Method CC.4: Prepare a regional forest spatial plan	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.		Accept in part
<b>S137.061</b>	Greater Wellington Regional Council (GWRC)	Method CC.4: Prepare a regional forest spatial plan	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.		Accept
<b>FS30.034</b>	Beef + Lamb New Zealand Ltd	Method CC.4: Prepare a regional forest spatial plan	Support in part	B+LNZ supports the intent of GWRC's submission to clarify that the objectives and policies 'are not intended to support unfettered afforestation across the region with the sole purpose of providing a carbon sink'. However, B+LNZ maintains significant concern with the drafting of these provisions and seek that they are withdrawn and redrafted when national legislation is completed. B+LNZ considers GWRC's submission points to highlight the need for well thought out provisions relating to climate change based on science and an understanding of the implications for productive land use and the rural community.	Allow in part		Accept in part
<b>FS13.041</b>	Wellington City Council	Method CC.4: Prepare a regional forest spatial plan	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow		Accept
<b>S144.012</b>	Sustainable Wairarapa Inc	Method CC.4: Prepare a regional forest spatial plan	Support in part	There could be a timeframe on this method eg 2025	Add a timeframe of 2025		Accept in part
<b>S147.097</b>	Wellington Fish and Game Council	Method CC.4: Prepare a regional forest	Support	Necessary to implement the NPS-FM.	Retain as notified.		Accept in part

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		spatial plan					
FS19.161	Wellington Water Ltd ("Wellington Water")	Method CC.4: Prepare a regional forest spatial plan	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow		Reject
FS30.266	Beef + Lamb New Zealand Ltd	Method CC.4: Prepare a regional forest spatial plan	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	Disallow	That the submission be disallowed with the exception of 147.007	Reject
S163.095	Wairarapa Federated Farmers	Method CC.4: Prepare a regional forest spatial plan	Oppose	<p>Support for the intent, however the proposed over-arching Objective A and B are intended to provide a concrete pathway towards a similar result.</p>	<p>That Method CC.4 be deleted.</p> <p>Delete the FW icon</p>		Reject
FS7.138	Royal Forest and Bird Protection Society (Forest & Bird)	Method CC.4: Prepare a regional forest spatial plan	Oppose	<p>It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.</p>	Disallow	Disallow whole submission	Accept in part
FS20.260	Ātiawa ki Whakaron gotai Charitable Trust	Method CC.4: Prepare a regional forest spatial plan	Oppose	<p>Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.</p>	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
FS29.111	Ngā Hapu o Otaki	Method CC.4:	Oppose	Section 18, page 4: General Comments - OPPOSE	Not stated		Accept

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		Prepare a regional forest spatial plan		<p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>			
FS30.167	Beef + Lamb New Zealand Ltd	Method CC.4: Prepare a regional forest spatial plan	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
S166.074	Masterton District Council	Method CC.4: Prepare a regional forest spatial plan	Support in part	<p>MDC requests to be one of the organisations involved with preparing this plan.</p> <p>Plan needed to ensure that the Wairarapa isn't used as the greater region's carbon sink.</p>	<p>Amend the Implementation section to read:</p> <p>Implementation: Wellington Regional Council* and city and district councils (<b>GWRC will co-lead with each city and district council with regard to their respective geographical areas</b>)</p>		Accept in part
S131.0136	Ātiawa ki Whakaron gotai Charitable Trust	Method CC.4: Prepare a regional forest spatial plan	Support	Ātiawa support Method CC.4, Ātiawa seek to partner with Regional Council on Method CC.4 - we seek specific reference to this partnership in the method.	Using a partnership approach, <b>work with mana whenua</b> to identify where to promote and support planting and natural regeneration of forest, including how to address water quality targets for sediment, to inform the requirements of Policy CC.6.		Accept
FS29.254	Ngā Hapu o Otaki	Method CC.4: Prepare a regional forest spatial plan	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further</p>	Not stated		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				<p>considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>			
S140.0112	Wellington City Council (WCC)	Method CC.4: Prepare a regional forest spatial plan	Support in part	Clarify intention of method, if it is to reduce sediment loading in waterbodies then this should be actioned by Regional Councils.	Amend Method CC.4 so that it does not apply to City and District Councils.		Accept in part
S165.0111	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Method CC.4: Prepare a regional forest spatial plan	Support in part	Support the intent to increase permanent forest, but submit that this should be extended to include other indigenous vegetation (either in this method or in a separate method). Also, while the method is titled 'Prepare a regional forest plan', that is not specifically required by the method itself.	<p>Amend as follows:</p> <p>Amend to make it clear that a regional forest spatial plan will be the outcome of this method.</p> <p>Using a partnership approach, <b>create a regional forest and vegetation spatial plan, which will identify where to promote and support planting and natural regeneration of forest, wetlands and other indigenous vegetation,</b> including how to address water quality targets for sediment, to inform the requirements of Policy CC.6.</p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS30.319	Beef + Lamb New Zealand Ltd	Method CC.4: Prepare a regional forest spatial plan	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
S167.0168	Taranaki Whānui	Method CC.4: Prepare a regional forest spatial plan	Support in part	<p>Given historical land confiscations and development barriers - there needs to be a specific protection in place to prevent further disadvantage to mana whenua.</p> <p>Future planning in partnership with mana whenua will provide greater confidence of the implementation through regional plans.</p> <p>Taranaki Whānui support the principle of this method. As per our comments on Policy CC.6, we would like to see firm protections in place for mana whenua. The 'partnership approach' needs to clearly state it is with mana whenua, who need to be resourced for this.</p> <p>Taranaki Whānui want to indicate their intention to work in partnership with councils to prepare these spatial plans.</p>	Retain as notified.		Accept in part
S168.0151	Rangitāne O Wairarapa Inc	Method CC.4: Prepare a regional forest spatial plan	Support in part	<p>Rangitāne o Wairarapa support Method CC.4 in part, to prepare a regional forest spatial plan using a partnership approach. However, we request that a timeframe of 2024 is specified to have the regional forest spatial plan in place, to be consistent with the timing of the climate extension programme directed in Method CC.8.</p> <p>In addition, the method should include specific provision to monitor the effectiveness and efficiency of implementing the plan.</p>	<p>Amend the method to:</p> <p>Specify a timeframe of 2024 to have the regional forest spatial plan in place;</p> <p>Make specific reference to partnering with mana whenua/tangata whenua to prepare the regional forest spatial plan;</p> <p>Include a specific provision to monitor the effectiveness and efficiency of implementing the plans.</p>		Accept
FS14.015	Masterton District Council	Method CC.4: Prepare a regional forest spatial plan	Support		Not stated	Mana whenua should be a partner in preparing the regional forest spatial plan.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS31.080	Sustainable Wairarapa inc	Method CC.4: Prepare a regional forest spatial plan	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui Ian Gun</p>	Not stated		Accept
S115.0110	Hutt City Council	Method CC.4: Prepare a regional forest spatial plan	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method CC.4 so that it does not apply to city and district councils.		Accept in part
S170.044	Te Rūnanga o Toa Rangatira	Method CC.6	Not Stated / Neutral	<p>Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p> <p>It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this</p>	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>		<p>Accept in part</p> <p>[This submission point was originally coded to the provision Policy CC.7 however, it has been updated to the corrected to the provision MethodCC.6].</p>

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				Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.			
<b>FS29.158</b>	Ngā Hapu o Otaki	Method CC.6	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making – Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 – Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>	Not stated		Accept in part
<b>S167.067</b>	Taranaki Whānui	Method CC.6:	Support	Taranaki Whānui supports new Policy CC.7 and notes in particular that it is informed by Method CC.6 which requires partnership with mana whenua.	Retain as notified,		Accept in part
<b>S34.044</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper	Method CC.6: Identifying nature-based solutions	Oppose in part	<p>Whilst this is identified as a GWRC action it is unclear whether and how territorial authorities will be involved in this important work.</p> <p>It is also unclear whether there is an expectation that this will also require a regulatory response by territorial authorities, given that the RPSPC1 proposes that district plans identify and provide for nature-based solutions</p>	Amend to clarify role for territorial authorities. See also related comments on Policy CC.7 and Objective CC.4.		Accept in part

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	Hutt City Council	for climate change		and seeks to include provisions in district plans relating to indigenous ecosystems.  See our notes on Objective CC.4 for comments regarding clarity of the definition of nature-based solutions.			
<b>S102.035</b>	Te Tumu Paeroa   Office of the Māori Trustee	Method CC.6: Identifying nature-based solutions for climate change	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.		Accept in part
<b>S147.098</b>	Wellington Fish and Game Council	Method CC.6: Identifying nature-based solutions for climate change	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.  Provide resilience for indigenous <b>and valued introduced</b> biodiversity from the impacts of climate change, enabling ecosystems and species to persist or adapt..."		Reject
<b>FS20.142</b>	Ātiawa ki Whakaron gotai Charitable Trust	Method CC.6: Identifying nature-based solutions for climate change	Oppose	Ātiawa do not support the rationale set out by Fish and Game, - indigenous ecosystems must be afforded the greatest protection above the protection of introduced ecosystems which already dominate te taiao, to the detriment of indigenous ecosystems. The relief sought by the submitter would like result in a status-quo outcome for indigenous ecosystems, Ātiawa are opposed to this outcome.	Disallow		Accept
<b>FS19.162</b>	Wellington Water Ltd ("Wellington Water")	Method CC.6: Identifying nature-based solutions for climate change	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS.  Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.  Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.  Some of the amendments undermine the more detailed content of PC1.	Disallow		Accept
<b>FS30.267</b>	Beef + Lamb New Zealand Ltd	Method CC.6: Identifying nature-based	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural	Disallow	That the submission be disallowed with the exception of 147.007	Accept

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		solutions for climate change		Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.			
<b>S163.097</b>	Wairarapa Federated Farmers	Method CC.6: Identifying nature-based solutions for climate change	Oppose	Generally support intentions to prioritise; and expect that any tools for prioritising investments will be informed by "best bang for buck" principles; and supported by NZ and local evidence on sequestration values. However, the proposed over-arching Objective A and B are intended to provide a concrete pathway towards a similar result.	That Method CC.6 be deleted.  Delete FW icon		Reject
<b>FS7.140</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Method CC.6: Identifying nature-based solutions for climate change	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept in part
<b>FS20.262</b>	Ātiawa ki Whakaron gotai Charitable Trust	Method CC.6: Identifying nature-based solutions for climate change	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
<b>FS29.113</b>	Ngā Hapu o Otaki	Method CC.6: Identifying nature-based solutions for climate change	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated		Accept
<b>FS30.169</b>	Beef + Lamb New	Method CC.6: Identifying	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to	Allow		Reject

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	Zealand Ltd	nature-based solutions for climate change		proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.			
<b>S131.0137</b>	Ātiawa ki Whakaron gotai Charitable Trust	Method CC.6: Identifying nature-based solutions for climate change	Support	Ātiawa support Method CC.6. Ātiawa seek that Regional Council provide for this partnership through adequate funding and resourcing.	Insert the following sentence to Method CC.6. <b>The Regional Council shall enable this partnership with mana whenua through adequate funding and resourcing.</b>		Accept in part
<b>FS29.255</b>	Ngā Hapu o Otaki	Method CC.6: Identifying nature-based solutions for climate change	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degredation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environemental resilience and the cultural agility our shared whakapapa offers.</p>	Not stated		Accept in part
<b>S165.0113</b>	Royal Forest and Bird Protection Society of	Method CC.6: Identifying nature-based	Support		Retain		Accept

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	New Zealand Inc. (Forest & Bird)	solutions for climate change					
<b>FS30.319</b>	Beef + Lamb New Zealand Ltd	Method CC.6: Identifying nature-based solutions for climate change	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
<b>S167.0170</b>	Taranaki Whānui	Method CC.6: Identifying nature-based solutions for climate change	Support	Taranaki Whānui support the inclusion of this method and in particular note the requirement to partner with mana whenua.  Taranaki Whānui want to indicate our intention to partner with council in this process.	Retain as notified.		Accept
<b>S168.0152</b>	Rangitāne O Wairarapa Inc	Method CC.6: Identifying nature-based solutions for climate change	Support in part	Rangitāne o Wairarapa support Method CC.6 in part, to identify nature-based solutions for climate change, however, we request that the method is expanded to include another sub-clause specifying those ecosystems which provide nature-based solutions to natural hazard mitigation.  Rangitāne o Wairarapa support provision for the council to partner with mana/tangata whenua to identify ecosystems that should be prioritised for protection, enhancement, and restoration; on the basis of their contribution as a nature-based solution to climate change.	Amend the method to include a sub-clause identifying ecosystems that provide nature-based solutions to natural hazard mitigation.		Accept
<b>FS31.081</b>	Sustainable Wairarapa inc	Method CC.6: Identifying nature-based solutions for climate change	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati	Not stated		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				<p>Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui lan Gun</p>			
<b>S168.0156</b>	Rangitāne O Wairarapa Inc	Method CC.6: Identifying nature-based solutions for climate change	Support	<p>Rangitāne o Wairarapa strongly support developing and promoting a range of incentives to support an equitable and inclusive transition to zero and low carbon transport.</p>	Retain as notified.		Accept
<b>FS31.085</b>	Sustainable Wairarapa inc	Method CC.6: Identifying nature-based solutions for climate change	Support	<p>Kia ora koutou, My name is lan Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui lan Gun</p>	Not stated		Accept
<b>S102.038</b>	Te Tumu Paeroa   Office of the Māori Trustee	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and	Support	<p>Generally supports the methods to implement for the 'Climate Change' chapter.</p>	Retain as notified.		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		nature-based solutions					
<b>S123.020</b>	Peter Thompson	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Support	Assistance is needed by care-groups and lanowners to care for indigenous ecosystems	Retain as notified.		Accept
<b>S144.025</b>	Sustainable Wairarapa Inc	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Support	Assistance is needed by care-groups and lanowners to care for indigenous ecosystems. Nature based solutions offer a wide range of benefits to be provided compared to grey/hard infrastructure.(see policy FW.7)	Retain as notified.		Accept
<b>FS14.046</b>	Masterton District Council	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Support	Agree with: Assistance is needed by care-groups and landowners to care for indigenous ecosystems. Nature based solutions offer a wide range of benefits to be provided compared to grey/hard infrastructure. (see policy FW.7)	Not stated Agree with relief sought: Retain as notified.	Agree with relief sought: Retain as notified.	Accept
<b>S147.033</b>	Wellington Fish and	Method CC.9: Support	Support	Note the typographical errors pp. 173 and 191, which read: "Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous	Ensure wording on page 64, 173 and 191 are consistent.		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
	Game Council	and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions		ecosystems and nature-based solutions". These should be amended to read as per pp. 64.	Retain as notified.		
<b>FS19.097</b>	Wellington Water Ltd ("Wellington Water")	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow		Reject
<b>FS30.202</b>	Beef + Lamb New Zealand Ltd	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	That the submission be disallowed with the exception of 147.007	Reject
<b>S166.078</b>	Masterton District Council	Method CC.9: Support and funding for protecting, enhancing, and restoring	Support	A healthy natural environment is a key tool in creating a climate resilient district so we are supportive of this method.	Retain as notified.		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		indigenous ecosystems and nature-based solutions					
<b>S131.0145</b>	Ātiawa ki Whakaron gotai Charitable Trust	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Support	Ātiawa support the intent of Method CC.9. Ātiawa seek the minor amendment to clarify reference to the correct policy.	Provide support, and seek new sources of funding, for programmes that protect, enhance or restore the priority ecosystems identified by Methods IE.2 and <b>Policy CC.7</b> for their biodiversity values and/or their contribution as naturebased solutions to climate change.		Accept
<b>FS29.264</b>	Ngā Hapu o Otaki	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degredation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to</p>	Not stated		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.			
<b>S163.0103</b>	Wairarapa Federated Farmers	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Oppose	Defer to the full review of the RPS in 2024.  General support for the intent but proposing an RPS Change One method is not a pre-condition for getting the job done.	That Method CC.9 be deleted.  Delete the FW icon		Reject
<b>FS30.072</b>	Beef + Lamb New Zealand Ltd		Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
<b>FS7.043</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow whole submission	Disallow whole submission	Accept in part
<b>FS20.165</b>	Ātiawa ki Whakaron gotai Charitable Trust	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow the entire submission by Wairarapa Federated Farmers.	Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		nature-based solutions					
FS29.016	Ngā Hapu o Otaki	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Oppose	<p>Section 18, page 4: General Comments – OPPOSE</p> <p>Section 25, Page 5 Going Forward – OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated		Accept
S165.0119	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Support in part	<p>Support this method, but caution that if the identification processes under Methods IE.2 and CC.7 are not broad enough, they may not capture all areas that would benefit from restoration. The policy should therefore be broader than currently drafted. There also needs to be provision for support in the period of time up until those identification processes are complete.</p> <p>The reference to Method CC.7 appears to be in error.</p> <p>Sought deletion of method IE.2 (above) and seek deletion of the reference in this method. IE.2 is about an inventory of offsetting and compensation opportunities for consent applicants. Method CC.9 is aimed at providing funding and support for enhancement or restoration of ecosystems for their biodiversity values and/or as nature-based CC solutions. These are different approaches to offsetting and compensation, and the two concepts should not be mixed.</p> <p>It would be more appropriate to link this to the restoration priorities covered in the regional biodiversity strategy.</p>	<p>Amend method as follows:</p> <p>Provide support, and seek new sources of funding, for programmes that protect, enhance or restore the priority ecosystems, <b>particularly the priority ecosystems</b> identified by <del>Methods IE.2 and the</del> <b>regional biodiversity strategy</b> and CC.7 for their biodiversity values and/or their contribution as nature-based solutions to climate change.</p> <p>Also include provision in the method for support prior to the identification processes having been completed. Refer to the regional biodiversity strategy, which appears to be intended to identify restoration priorities.</p>		Accept in part
FS20.081	Ātiawa ki Whakaron gotai Charitable Trust	Method CC.9: Support and funding for protecting, enhancing	Oppose	<p>Ātiawa do not support the reasoning and relief sought by Forest and Bird in regards to these submission points. As in our original submission, Ātiawa support partnering with mana whenua to develop an inventory of opportunities for biodiversity offsetting or biodiversity compensation. Ātiawa's position is that priority should be given to protecting, maintaining or enhancing biodiversity. Ātiawa seek that this partnership approach shall be enabled through funding and resourcing.</p>	Disallow		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		, and restoring indigenous ecosystems and nature-based solutions					
<b>FS30.319</b>	Beef + Lamb New Zealand Ltd	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
<b>S167.0177</b>	Taranaki Whānui	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-based solutions	Support	Taranaki Whānui support the principle of this new method. We would like to see clarity around the support and funding for mana whenua partners in particular.	Retain as notified.		Accept
<b>S168.0155</b>	Rangitāne O Wairarapa Inc	Method CC.9: Support and funding for protecting, enhancing , and restoring indigenous ecosystems and nature-	Oppose in part	<p>Rangitāne o Wairarapa oppose Method CC.9 in part and seek that specific provision is made for mana/ tangata whenua led programmes to be developed where priority indigenous ecosystems have been identified by Methods IE. 2 and CC.6.</p> <p>We also seek that these programmes are 'implemented'.</p> <p>The reference to CC.7 appears to be an error.</p> <p>The word 'indigenous' should be inserted to ensure the focus is on the appropriate biodiversity values.</p>	<p>Amend the method:</p> <p>To make specific provision for mana/ tangata whenua led programmes to be developed where priority indigenous ecosystems have been identified by Methods IE. 2 and CC.6;</p> <p>'To <b>implement</b> programmes that protect, enhance...' <b>To replace text CC.7 with</b></p>		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		based solutions			<b>CC.6;</b>  To include the word ' <b>indigenous</b> ' before 'biodiversity values'.		
<b>FS31.084</b>	Sustainable Wairarapa inc	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui Ian Gun	Not stated		Accept
<b>S20.004</b>	Mangaroa Peatland Focus Group_Paul Dyson	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S21.004</b>	Mangaroa Peatland Focus Group_Liorah Atkinson	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and		accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					compensation for any loss of use by landowners.		
<b>S23.004</b>	Mangaroa Peatland Focus Group_Ian Spendlove	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S26.004</b>	Mangaroa Peatland Focus Group_An drea Follett	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S31.028</b>	Robert Anker	Nature-based solutions	Oppose in part	The inclusion of the reference to peatland within a definition constitutes an attempt to regulate by stealth. GWRC needs to clearly state what it means by "protecting" peatland and exactly what form that protection would take.  The Mangaroa peatland overlay encompasses over 75 individual landowners and not one single one has been consulted.  The community feels very strongly regarding the high-handed approach taken by GWRC and the devious manner in which it appears to be trying to gain control of all aspects regarding the peatland. The community perception is highly influenced by the past track record of GWRC in taking punitive action against this community.	Remove bullet point under the example section, to read:  Examples include: ... <del>• protecting peatland to retain carbon stores</del>		accept in part
<b>S31.029</b>	Robert Anker	Nature-based solutions	Oppose in part	The inclusion of the reference to peatland within a definition constitutes an attempt to regulate by stealth. GWRC needs to clearly state what it means by "protecting" peatland and exactly what form that protection would take.  The Mangaroa peatland overlay encompasses over 75 individual landowners and not one single one has been consulted.  The community feels very strongly regarding the high-handed approach taken by GWRC and the devious manner in which it appears to be trying to gain control of all aspects regarding the peatland. The community	GWRC be instructed to cease and desist in yet another attempt to gain control over the Mangaroa peatland.  GWRC be required to formulate extensive policies and methodologies regarding the peatland and		accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				perception is highly influenced by the past track record of GWRC in taking punitive action against this community.	the implications around loss of use by landowners.		
<b>S33.004</b>	Mangaroa Peatland Focus Group_Sandy, Judith, Kauika-Stevens	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S38.004</b>	Mangaroa Peatland Focus Group_Heather McKay	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S39.004</b>	Mangaroa Peatland Focus Group_Colin Hawes	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S40.004</b>	Mangaroa Peatland Focus Group_Lauritz & Julie Rust	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.		accept in part
<b>S41.004</b>	Mangaroa Peatland Focus	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland	That the concept of "protecting peatland to retain carbon stores" is struck out		accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
	Group_Andrew Ayrton & Carol Reeves			overlay encompasses over 75 individual landowners and not on single one has been consulted.	pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		
<b>S42.004</b>	Mangaroa Peatland Focus Group_Gregor & Stephanie Kempt	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S43.004</b>	Mangaroa Peatland Focus Group_Carol Dormer	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S44.004</b>	Mangaroa Peatland Focus Group_Richard Dormer	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part

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S45.004	Mangaroa Peatland Focus Group_ Weston Hill	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
S46.004	Mangaroa Peatland Focus Group_Ly nne Hill	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
S47.004	Mangaroa Peatland Focus Group_No rman Hill	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
S48.004	Mangaroa Peatland Focus Group_Du ncan Carmichae l	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and		accept in part

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					compensation for any loss of use by landowners.		
<b>S52.005</b>	Gerald Keown _Mangaroa Peatland Focus Group	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>FS5.3</b>	Brendan Herder	Nature-based solutions	Support	This submission to delete the example of "protecting peatland to retain carbon stores" from the definition of Nature-Based Solutions should be allowed. I understand from neighboring residents that the Mangaroa Peatland Hazard Overlay proposed by Upper Hutt City Council has not been adequately ground proven and previous enforcement actions sought by Greater Wellington Regional Council in relation to the Mangaroa Peatland have been declined by the Environment Court in Adams v Others (2022 Decision 025). In this context the inclusion of a specific peatland example in this otherwise very broad definition is unnecessarily contentious.	Allow		accept in part
<b>S54.004</b>	Mangaroa Peatland Focus Group_Helen Masters	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S55.004</b>	Mangaroa Peatland Focus Group_Matthew Scrimshaw	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S57.005	Colleen Munro _Mangaroa Peatland Focus Group	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
S58.005	Grant Munro _Mangaroa Peatland Focus Group	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
FS7.004	Royal Forest and Bird Protection Society (Forest & Bird)	Nature-based solutions	Oppose	This is just an example within a definition. Nature based solutions are enshrined in New Zealand's Emissions Reduction Plan and National Adaptation Plan which this plan change is giving effect to.	Disallow	Disallow whole submission point.	accept in part
S59.004	Mangaroa Peatland Focus Group_Sandra & Mat Gerrard	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
S62.026	Philip Clegg	Nature-based solutions	Oppose in part	Opposes the inclusion of the reference to peatland within the definition of 'nature-based solutions' as this is contrary to the Environment Court's finding in GWRC v Adams and ors. Concerned that the reference to peatland being protected to retain carbon stores will be used as justification to limit the use of the peatland by its owners.	Remove "protecting peatland to retain carbon stores" from the definition.		accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S87.004	Roger O'Brien_Mangaroa Peatland Focus Group_	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
S91.004	Mangaroa Peatland Focus Group_Gavin Kirton	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted. The community feels very strongly regarding the high-handed approach taken by GWRC and the devious way it appears to be trying to gain control of all aspects regarding the peatland.  The inclusion of the reference to peatland within a definition constitutes an attempt to regulate by stealth, and flies in the face of the Environment Court's expectation that people on the peatland would be left to the quiet enjoyment on their land. It smacks of bad faith regulation.  The community is aware that GWRC officials have long sought to limit use of the peatland, first through wetland rules, then using SNA rules and now, it seems by citing it as a carbon sink.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
S96.022	Sarah (Dr) Kerkin	Nature-based solutions	Oppose in part	Opposes the inclusion of the reference to peatland within the definition of 'nature-based solutions' as this is contrary to the Environment Court's finding in GWRC v Adams and ors. Concerned that the reference to peatland being protected to retain carbon stores will be used as justification to limit the use of the peatland by its owners.	Remove "protecting peatland to retain carbon stores" from the definition.		accept in part
FS5.7	Brendan Herder	Nature-based solutions	Support	This submission to delete the example of "protecting peatland to retain carbon stores" from the definition of Nature-Based Solutions should be allowed. I understand from neighboring residents that the Mangaroa Peatland Hazard Overlay proposed by Upper Hutt City Council has not been adequately ground proven and previous enforcement actions sought by Greater Wellington Regional Council in relation to the Mangaroa Peatland have been declined by the Environment Court in Adams v Others (2022 Decision 025). In this context the inclusion of a specific peatland example in this otherwise very broad definition is unnecessarily contentious.	Allow		accept in part
S97.004	Mangaroa Peatland Focus Group_Nicola Rothwell	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.		accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		
S99.005	Genesis Energy Limited	Nature-based solutions	Support in part	Genesis considers the development of electricity from renewable sources is a nature-based solution that reduces greenhouse gas emissions whilst providing resilience for people. In taking actions to address climate change, it is necessary to consider the natural and the built environment in a holistic manner, and provide integration as much as possible.	<p>Amend the definition as follows:</p> <p>Nature-based solutions</p> <p>Actions to protect, enhance, or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce greenhouse gas emissions and/or strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects of climate change.</p> <p>Examples include: Reducing greenhouse gas emissions (climate change mitigation):</p> <ul style="list-style-type: none"> <li>• planting forests to sequester carbon</li> <li>• protecting peatland to retain carbon stores</li> </ul> <p>Increasing resilience (climate change adaptation):</p> <p>(a) providing resilience for people</p> <ul style="list-style-type: none"> <li>• planting street trees to provide relief from high temperatures</li> <li>• restoring coastal dunelands to provide increased resilience to the damaging effects of storms linked to sea level rise</li> <li>• leaving space for rivers to undertake their natural movement and accommodate increased floodwaters</li> </ul>		accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					<ul style="list-style-type: none"> <li>the use of water sensitive urban design, such as rain gardens to reduce stormwater runoff in urban areas</li> <li><b>maximising electricity generation from renewable energy sources, recognising that renewable electricity generation can often be incorporated within the natural and built environments (e.g. wind farm and carbon forestry, solar panels on rooftops)</b></li> </ul> <p>(b) providing resilience for ecosystems and species</p> <ul style="list-style-type: none"> <li>restoring indigenous forest to a healthy state to increase its resilience to increased climate extremes</li> <li>leaving space for estuarine ecosystems, such as salt marshes, to retreat inland in response to sea level rise.</li> </ul>		
<b>FS26.069</b>	Meridian Energy Limited	Nature-based solutions	Support	<p>Genesis (page 10) considers the development of electricity from renewable sources is a nature-based solution that reduces greenhouse gas emissions whilst providing resilience for people. In taking actions to address climate change, it is necessary to consider the natural and the built environment in a holistic manner, and provide integration as much as possible. Seeks insertion of text:</p> <p><b>'(a) providing resilience for people ... maximising electricity generation from renewable energy sources, recognising that renewable electricity generation can often be incorporated within the natural and built environments (e.g., wind farm and carbon forestry, solar panels on rooftops).</b></p> <p>Meridian agrees there is merit in viewing renewable electricity generation as a form of nature-based solution.</p>	Allow		Accept in part
<b>S101.004</b>	Mangaroa Peatland Focus Group_Ma deline Keown	Nature-based solutions	Oppose in part	<p>GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.</p>	<p>That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.</p> <p>Formulate simple, clear rules</p>		accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					regarding the peatland and the implications around and compensation for any loss of use by landowners.		
<b>S103.004</b>	Mangaroa Peatland Focus Group_ Stacey Jack-Kino	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S104.004</b>	Hamish McDonald_Mangaroa Peatland Focus Group	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S105.004</b>	Sharlene McDonald_Mangaroa Peatland Focus Group	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S107.005</b>	Lisa Keown_Mangaroa Peatland Focus Group	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.		accept in part

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					Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		
<b>S108.004</b>	Mangaroa Peatland Focus Group_Kerry Ryan	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S109.004</b>	Mangaroa Peatland Focus Group_Christine withey	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S110.004</b>	Mangaroa Peatland Focus Group_John Ryan	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
<b>S111.004</b>	Mangaroa Peatland Focus Group_Sheila Ryan	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.		accept in part

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					Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		
S112.004	Mangaroa Peatland Focus Group_Russell Flood-Smith	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		accept in part
S113.052	Wellington Water	Nature-based solutions	Oppose	The definition doesn't give effect to the NPS-FM and would benefit from the addition of an additional example.	Amend the definition (with new bullet point added) to state:  Actions to protect, enhance, or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce greenhouse gas emissions <b>or give effect to Te Mana o te Wai</b> and/or strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects of climate change.  Examples include:  Reducing greenhouse gas emissions (climate change mitigation):  ... • <b>application of wastewater sludge to land rather than landfills</b>		reject
S121.004	Mangaroa Peatland Focus Group_Sh	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and		Accept in part

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	ane Stratford				extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		
<b>S122.004</b>	Mangaroa Peatland Focus Group_Jaime Walsh	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		Accept in part
<b>S138.004</b>	Mangaroa Peatland Focus Group_Jody Sinclair & Josh Lowmy	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		Accept in part
<b>S139.010</b>	Ian Gunn	Nature-based solutions	Support in part		Definition of Nature based solutions be expanded to include farming scale methods such as swales, bunds, leaky dams to slow down runoff ie reduce flood peaks plus a range of additional benefits.		Accept
<b>S144.036</b>	Sustainable Wairarapa Inc	Nature-based solutions	Support in part	Nature based solutions for water resilience are essential.	Expand to include nature-based solutions for water resilience such as farm-scale structures for slowing water down (swales, bunds, leaky dams), managing flooding to increase ground water recharge and improving the		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					water holding capacity of soils (e.g. reducing compaction).		
<b>S146.004</b>	Mangaroa Peatland Focus Group_Alan Rothwell	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		Accept in part
<b>S149.004</b>	Mangaroa Peatland Focus Group_Matthew Rothwell	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		Accept in part
<b>S150.004</b>	Mangaroa Peatland Focus Group_Anna Brodie & Mark Leckie	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		Accept in part
<b>S156.004</b>	Mangaroa Peatland Focus Group_Tim Rothwell	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					regarding the peatland and the implications around and compensation for any loss of use by landowners.		
<b>S159.004</b>	Mangaroa Peatland Focus Group_Antony & Jemma Ragg	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.		Accept in part
<b>S160.004</b>	Mangaroa Peatland Focus Group_Jen & Chris Priest	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.  Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.		Accept in part
<b>S161.004</b>	Grant O'Brien	Nature-based solutions	Oppose in part	As a resident who would be affected by this change we do not support this statement in absence of engagement to explain what is meant by 'protecting peatlands'. For example, is GW talking about limiting earthworks or protecting the peatlands with a designation? The options are unknown and for this reason we do not support this statement at this time. Internationally recognised science-based methods need to be considered. Landowners would need compensation for losses of investment and livelihood on their land.	Remove 'protecting peatlands to retain carbon stores' until the peatlands in question are mapped and understood, landowners engaged with/advised and further explanation about what is meant by 'protection'.		Accept in part
<b>S162.028</b>	Winstone Aggregates	Nature-based solutions	Oppose	Winstone is opposed/ neutral to the inclusion of the listed new definitions. It is unclear where some of these defined terms have come from or what the basis is for defining these terms in this way. Some do not appear to reflect up to date caselaw, the RMA or even the draft NPS-IB. Others appear to reflect NRP definitions but it is unclear how these change the interpretation of the RPS policies.  Winstone is concerned about seeking to adopt the draft NPS-IB definitions in advance of these being settled. There is insufficient information contained in the s32 evaluation to understand how the impact of these definitions or how they will impact original wording and policies as well as proposed objectives, policies and methods. Further information and evidence as to how these have been developed is requested.  Winstone is concerned that the definitions take an overly restrictive approach, may have unintended consequences and seeks amendments be made to ensure that the definitions are in line with the NPS and RMA caselaw and ensure that there is a viable and workable pathway to continue to undertake /consent quarrying activities.	Any amendments required to address the submitters concerns set out above or consequential amendments required to the policies, objectives and methods than refer to these definitions.		reject

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<b>FS20.296</b>	Ātiawa ki Whakaron gotai Charitable Trust	Nature-based solutions	Oppose	<p>Ātiawa oppose the submissions from Aggregate and Quarry Association and Winstone Aggregates to the extent that the relief sought is inconsistent with national direction, particularly the NPS-FM.</p> <p>Ātiawa are particularly sensitive to aggregate extraction from awa, it is mana whenua who are guaranteed tino rangatiratanga over the land, waterways and all other taonga (including aggregate) through Te Tiriti o Waitangi. Historically aggregate extraction industry has failed to uphold the articles and the principles of Te Tiriti. Additionally, aggregate extraction has adverse effects on te taiao and mana whenua values.</p> <p>On the matter of 'balancing' national policy statements', recent case law states that the NPS-FM 2020 and NPS-UD 2020 are to be read together and reconciled under the regional policy statement and the district plans. It goes on to say, development capacity does not outweigh (trump) Te Mana o te Wai. Te Mana o te Wai is the fundamental concept of freshwater management: any thinking to the converse would not give effect to either national policy statement. Therefore, to reconcile national direction, it is not a balancing act, or even a compromise, the NPS-FM must be given effect to while achieving the purpose of the NPS-UD for example. This can be applied to aggregate extraction, the activity must be consistent with Te Mana o te Wai and the NPS-FM. The need for housing capacity is not license to forgo the requirements of the NPS-FM.</p>	Disallow		Accept
<b>S166.006</b>	Masterton District Council	Nature-based solutions	Support in part	<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>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>	Request a clearer definition of nature-based solutions.		Accept in part
<b>S168.090</b>	Rangitāne O Wairarapa Inc	Nature-based solutions	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.		Accept in part
<b>FS31.200</b>	Sustainable Wairarapa inc	Nature-based solutions	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable</p>	Not stated		Accept in part

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				Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.  Nga mihi nui lan Gun			
<b>S30.0108</b>	Porirua City Council	Nature-based solutions	Oppose	Council opposes this definition and seeks its deletion for the following reasons: <ul style="list-style-type: none"> <li>• It lacks the necessary specificity required for a definition to enable effective and efficient implementation in a regulatory framework (district plan and regional plan).</li> <li>• The lack of clarity is illustrated by the need to include a wide range of examples.</li> </ul>	Delete definition, or amend so that it provides clear and appropriate direction to plan users.		Accept in part
<b>FS25.024</b>	Peka Peka Farm Limited	Nature-based solutions	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part
<b>S34.0105</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Nature-based solutions	Support in part	Council supports the intent of the definition but notes there needs to be a balance between increased trees with increased need for development. See comments on not directing in above policies and methods.  Council considers planting forest as an action to reduce greenhouse gases, but the protection of peatlands is not an action (at least in the Upper Hutt context) and is not considered to be a good example for inclusion in the RPS.	That the definition is amended to delete 'protecting peatland to retain carbon stores.		Accept in part
<b>S115.0124</b>	Hutt City Council	Nature-based solutions	Not Stated / Neutral	This definition is not clear enough to provide direction to plan users. The need for a significant number of examples illustrates this.	Amend the definition to provide clarity about what is covered by the term.		Accept in part
<b>S140.0125</b>	Wellington City Council (WCC)	Nature-based solutions	Support in part	Actions such are planting street trees and water sensitive urban design are not enhancing natural ecosystems as they are often isolated from other areas of biodiversity and serve a different function than the 'natural ecosystem' would perform.  The definition should not include examples as that should be incorporated into the implementation (method) of the policy.	Amend:  Actions to protect, enhance, <b>mimic</b> , or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce greenhouse gas emissions and/or strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects of climate change.		Accept in part
<b>FS14.049</b>	Masterton District Council	Nature-based solutions	Support in part	Agree with:  Actions such are planting street trees and water sensitive urban design are not enhancing natural ecosystems as they are often isolated from other areas of biodiversity and serve a different function than the 'natural ecosystem' would perform. The definition should not include examples as that should be incorporated into the implementation (method) of the policy.	Not stated	Agree with relief sought: Amend: Actions to protect, enhance, mimic, or restore natural ecosystems, and the incorporation of natural elements into	Accept in part

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						built environments, to reduce greenhouse gas emissions and/or strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects climate change.	
<b>S163.0109</b>	Wairarapa Federated Farmers	Nature-based solutions	Oppose	Defer to the 2024 RPS review  Alternatively, use the definition of nature-based solutions from the NZ Biodiversity Strategy 2020 as it is more succinct.	Delete the new definition  OR  Insert the following definition of nature-based solutions to align with the NZ Biodiversity Strategy: <b>Solutions that are inspired and supported by nature, cost-effective and simultaneously provide environmental, social and economic benefits and help build resilience.</b>  Delete the FW icon		Reject
<b>FS28.095</b>	Horticulture New Zealand	Nature-based solutions	Support	Support alignment with the NZ Biodiversity Strategy	Allow	Allow relief	Reject
<b>FS7.049</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Nature-based solutions	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept in part
<b>FS20.171</b>	Ātiawa ki Whakarongotai Charitable Trust	Nature-based solutions	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
<b>FS29.022</b>	Ngā Hapu o Otaki	Nature-based solutions	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners.	Not stated		Accept

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				<p>It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>			
FS30.078	Beef + Lamb New Zealand Ltd	Nature-based solutions	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
S165.0136	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Nature-based solutions	Support		Retain, but include further examples for ecosystems and species that go beyond forests and estuarine ecosystems. Alternatively, make it more clear that the examples are not exhaustive.		Accept in part
FS20.095	Ātiawa ki Whakaron gotai Charitable Trust	Nature-based solutions	Support in part	Ātiawa seek that the definitions are retained as drafted.	Disallow	Disallow the submission point, and retain the definitions as drafted.	Accept in part
FS30.319	Beef + Lamb New Zealand Ltd	Nature-based solutions	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
S170.009	Te Rūnanga o Toa Rangatira	Objective CC.4	Not Stated / Neutral	The nature-based solutions suggest that there are a handful of proven and trustworthy solutions and proposals in place to responding to Climate Change. However, if looked closer, this objective targets increasing planting practices, as well as the planting extent that aims to achieve multiple outcomes as a core part of climate change adaptation. It is encouraging to see the role of increasing our forest cover and ecosystems,	Clarify/assess whether forest spatial plans could draw us away from the implementation path, as well as the impact on land ownership and land use.		Accept in part  [This submission point was originally coded to the provision Objective CC.3

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				<p>however the current phrasing and content of the Objective and what is actually meant, could lead to misunderstanding of offering less of a kete of larger solutions.</p> <p>The consideration behind preparing forest spatial plans seem to align with the intention of increasing forest cover for climate change adaptation purposes. However, it is unclear whether such exercise is time and resource intensive and could draw us away from the implementation path. Another question regarding spatial forest plans is that how this impacts on land ownership and land use.</p>			however, it has been updated to the corrected to the provision Objective CC.4].
<b>FS29.123</b>	Ngā Hapu o Otaki	Objective CC.4	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>	Not stated	Not stated	Accept in part
<b>S16.009</b>	Kāpiti Coast	Objective CC.4	Support in part	<p>Council does not oppose the objective on the condition any regulatory methods to achieve the objective are not the responsibility of city and district councils. Council also notes that apart from the provision of natural</p>	Ensure all regulatory methods (apart from those that are consistent with and		Accept in part

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	District Council			defences against coastal hazards under Policy 26 of the NZCPS, the concept of nature-based solutions is not supported by the RMA or higher-level statutory planning document, making regulatory methods more difficult to justify under section 32 of the RMA.	give effect to the NZCPS) proposed to achieve Objective CC.4 do not apply to city and district councils		
FS20.037	Ātiawa ki Whakaron gotai Charitable Trust	Objective CC.4	Oppose	Under the s7(i) all person's exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to the effects of climate change. This includes city and district councils, it is important that Kāpiti Coast District Council takes a leadership role in working with Greater Wellington Regional Council and mana whenua to achieve climate change adaptation and mitigation.	Not stated	Not stated	Accept in part
S30.007	Porirua City Council	Objective CC.4	Oppose	This objective is not clear enough as to what is to be achieved, or more so, to what extent are improvements to be achieved. A small minor improvement in one part of the region would achieve this objective. More thought needs to be given as to how this objective is going to be measured. It is not clear whether the focus of the objective is achieving social and environmental outcomes, or the use of nature-based solutions (which is a method to achieve outcomes).	Amend the objective so that it is clear what the outcome sought is.		Accept in part
FS25.012	Peka Peka Farm Limited	Objective CC.4	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Allow	Accept in part
FS3.011	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Objective CC.4	Support	Waka Kotahi supports further clarification on outcome sought.	Allow	Allow	Accept in part
S34.040	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Objective CC.4	Support in part	The is supported in principle but the Council has some concerns over the policies that relate to this objective.  There is no full understanding of the maintenance costs associated with nature-based solutions, such as rain gardens in the long term and to whom this burden should fall within the context of limited territorial authority resources. It is noted that nature-based solutions have been defined in a loose way which can lead to inconsistencies and confusion. It is unclear whether it is expected that territorial authorities would define what this means, given the policies in the RPSPC1 that require provisions in district plans for them.  It is also noted that nature-based solutions seem too be used interchangeably with green infrastructure, which has not been defined. Council seeks consistency in terms used within the RPS.	Amend to read that "nature-based solutions are <b>recognised as an integral part</b> "  Allow district councils to define and provide guidance on what tools best work under this policy as a mean of compliance, through their own definition of nature-based solutions.  Provide clarity on nature-based solutions vs. green infrastructure and apply consistent terms throughout the RPS.		Accept in part
S79.004	South Wairarapa District Council	Objective CC.4	Support in part	The definition 'nature-based solutions' has a wide scope and will include afforestation. The particular concern from South Wairarapa about these tools is that some of them will be used disproportionately in the Wairarapa sub-region, namely carbon farming. This has the potential to displace the	[Note: Submission references prior Submission Point S79.002]		Accept in part

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				significant economic drivers of our communities and then the social infrastructure and communities themselves. As noted in our submission on CC.2, it is fair to require reductions and mitigations to occur 'at source' in the first instance.	No changes required if amendments to CC.2 are accepted. If relief is not accepted then the following amendments are sought: <b>The equitable use of</b> Nature-based solutions <b>are an</b> integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment  [End of amendments to Objective CC.4]  Or, similar relief to the same effect;  AND;  Any consequential amendments to give effect to the relief sought.		
<b>S102.007</b>	Te Tumu Paeroa   Office of the Māori Trustee	Objective CC.4	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.	Retain as notified.	Accept in part
<b>S113.004</b>	Wellington Water	Objective CC.4	Support in part	Nature based solutions aren't always practicable in Wellington's constrained urban environments.	Amend Objective CC.4 as follows:  Objective CC.4 <b>Where practicable</b> , Nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment.		Accept in part
<b>FS13.008</b>	Wellington City Council	Objective CC.4	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow	Allow	Accept in part
<b>FS28.018</b>	Horticulture New Zealand	Objective CC.4	Support	The amendment sought provides alternative relief that aligns with HortNZ's submission.	Allow  Allow amendment to Objective CC.4	Allow	Accept in part
<b>S115.009</b>	Hutt City Council	Objective CC.4	Support	No reasons given	Retain as notified	Retain as notified	Accept in part

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S123.003	Peter Thompson	Objective CC.4	Support	Nature-based solutions are key to dealing with the impacts of climate change.	Retain as notified	Retain as notified.	Accept in part
S128.006	Horticulture New Zealand	Objective CC.4	Support	It is noted that the National Adaptation Plan seeks to prioritise nature-based solutions where possible and to increase their integration into urban form, and support for working with nature to build resilience. Generally supports this outcome, where it is possible, also while recognising that additional solutions will be needed. The wording in the objective of nature-based solutions being an 'integral part' of climate change mitigation and adaptation, in our view acknowledge they will not be the only part - which is important to acknowledge. For example, water infrastructure will be critical in enabling the horticulture sector to adapt to the changing climate, while reducing impacts on ecosystems and safeguarding the HPL resource for future generations.		Retain as notified.	Accept in part
S131.024	Ātiawa ki Whakaron gotai Charitable Trust	Objective CC.4	Support	In principle Ātiawa supports Objective CC.4. Ātiawa supports the use of nature-based solutions to provide solutions for climate change mitigation and adaptation. Given the fact that nature-based solutions align with mātauranga Māori approaches, Ātiawa seek to partner with council in identifying approaches.	Amend to:  Nature-based solutions <b>and mātauranga Māori</b> are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment.	Amend to:	Accept in part
FS29.295	Ngā Hapu o Otaki	Objective CC.4	Support	Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.  There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.  This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.  3.4 Freshwater including Public Access - Support in Principal  3.6 Indigenous Ecosystems - Support in Principal  3.9 Regional Form, Design and Function - Support in Principal  Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga	Not stated	Not stated	Accept in part

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				across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.			
<b>S133.030</b>	Muaūpoko Tribal Authority	Objective CC.4	Support	Supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR  Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tarais recognised.	Retain as notified. OR	Accept in part n
<b>FS20.377</b>	Ātiawa ki Whakaron gotai Charitable Trust	Objective CC.4	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.	Disallow  Disallow the whole submission	Disallow	Reject
<b>S136.012</b>	DairyNZ	Objective CC.4	Oppose	Believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach. Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.	Delete Objective CC.4 and any related provisions or methods and address the issue through a full review of the RPS.		Reject

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FS30.018	Beef + Lamb New Zealand Ltd	Objective CC.4	Support	B+LNZ supports the withdrawal of provisions relating to climate change in order to undertake the necessary analysis, use the most up to date science and be consistent with national direction on climate change.	Allow	Allow	Reject
S140.010	Wellington City Council (WCC)	Objective CC.4	Support	Support as proposed.	Retain as notified.	Retain as notified.	Accept in part
S144.006	Sustainable Wairarapa Inc	Objective CC.4	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services , such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.	Retain as notified.	Accept in part
S148.018	Wellington International Airport Ltd (WIAL)	Objective CC.4	Oppose in part	WIAL seeks that this objective suitably recognises that nature based responses are not always practicable within urban environments, and in some instances may present a direct conflict with the operational and safety of an infrastructure asset (e.g. by attracting birds to the airport surrounds).	Amend the objective as follows,  or delete: <b>Where practicable</b> , nature based solutions are an integral part of climate changemitigation and adaptation, improving the health and resilience ofpeople, biodiversity, and the natural environment.		Accept in part
FS7.007	Royal Forest and Bird Protection Society (Forest & Bird)	Objective CC.4	Oppose	The amendment sought fails to give effect to the Emissions Reduction Plan and the National Adaptation Plan which emphasises the prioritisation of nature-based solutions as a critical action to facilitate adaptation options.	Disallow  Disallow insertion of Where practicable.	Disallow	Accept in part
S158.006	Kāinga Ora Homes and Communities	Objective CC.4	Support in part	Seeks clarity as to how the improvement of the health and resilience of people falls within this objective. The focus of the associated policies are limited to ecosystems and the natural environment and seeks amendments.  Seek that a definition or examples of nature-based solutions are included for provide clarity.  Amend the objective to focus on the health and well-being of people. It is unclear how it will improve resilience of people.	Amend the objective as such:  Nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and <b>well-being</b> resilience of people, biodiversity, and the natural environment.  [Note: End of amendment]  AND  Include a policy to link the health and wellbeing of people within the related policies. Otherwise the objective should remove the		Accept in part

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					reference to people and the focus should be on ecosystems and the natural environment - which in turn will support, enhance and improve people's health and well-being.  AND  Include a definition and examples of nature-based solutions.		
<b>S163.015</b>	Wairarapa Federated Farmers	Objective CC.4	Oppose	A wider portfolio of tools is required than just "nature-based solutions", including constructed or engineered solutions and technological developments. Nature-based solutions may also integrate both "natural" and "constructed" elements, eg, in the case of water storage. The proposed new over-arching Objective B is intended as a practical pathway towards a similar result.			Reject
<b>FS7.059</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Objective CC.4	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow  Disallow whole submission	Disallow	Accept in part
<b>FS20.181</b>	Ātiawa ki Whakaron gotai Charitable Trust	Objective CC.4	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow  Disallow the entire submission by Wairarapa Federated Farmers.	Disallow	Accept in part
<b>FS29.032</b>	Ngā Hapu o Otaki	Objective CC.4	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated	Not stated	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS30.088	Beef + Lamb New Zealand Ltd	Objective CC.4	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Allow	Reject
S165.006	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Objective CC.4	Support	Nature-based solutions are critical to our response to climate change and a core principle of the Emissions Reduction Plan.	Retain	Retain	Accept
FS30.319	Beef + Lamb New Zealand Ltd	Objective CC.4	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Disallow	Reject
S166.005	Masterton District Council	Objective CC.4	Oppose in part	Will look at how this can be reflected as part of the review of the Wairarapa Combined District Plan.  All councils need to ensure that they have their own nature-based solutions, and that enforcement needs to be equitable across the region.	Clarifications.  All councils need to ensure that they have their own nature-based solutions, and that enforcement needs to be equitable across the region.  Clarity needed on what 'integral' means in this context.	Clarifications.	Accept in part
S167.021	Taranaki Whānui	Objective CC.4	Support	Taranaki Whānui supports Objective CC.4	Retain as notified.	Retain as notified.	Accept in part
S168.0108	Rangitāne O Wairarapa Inc	Objective CC.4	Support in part		Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these		Accept in part

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					measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it has to be a no-cost solution).		
<b>FS31.033</b>	Sustainable Wairarapa inc	Objective CC.4	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>	Not stated	Not stated	Accept in part
<b>S168.0112</b>	Rangitāne O Wairarapa Inc	Objective CC.4	Support	Rangitāne o Wairarapa strongly support Objective CC.4 to ensure that nature-based solutions are an integral part of climate change responses.	Retain as notified.	Retain as notified.	Accept in part
<b>FS31.038</b>	Sustainable Wairarapa inc	Objective CC.4	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original</p>	Not stated	Not stated	Accept in part

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				<p>submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>			
<b>FS20.038</b>	Ātiawa ki Whakaron gotai Charitable Trust	Objective CC.4	Oppose	Under the s7(i) all person's exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to the effects of climate change. This includes city and district councils, it is important that Kāpiti Coast District Council takes a leadership role in working with Greater Wellington Regional Council and mana whenua to achieve climate change adaptation and mitigation.	Not stated	Not stated	Accept
<b>S16.010</b>	Kāpiti Coast District Council	Objective CC.5	Support in part	Council opposes the implementation of the regional forest spatial plan being the responsibility of city and district councils. GWRC has the ability to impose methods under section 30 of the RMA to achieve the objective via regional plan rules.	Delete city and district councils from having responsibility for the implementation of Objective regional forest spatial plan that is identified as a method to achieve Objective CC.5.		Accept in part
<b>S25.006</b>	Carterton District Council	Objective CC.5	Support in part	CDC supports the increase in permanent forest across the region, but is concerned that the Wairarapa will be disproportionately affected by an increase in carbon farming. CDC seeks early involvement of a regional forest spatial plan to ensure that Carterton district is not expected to provide inequitable areas of forestry.	<p>Retain the policy.</p> <p>[CDC] Seeks early engagement with GWRC in the development of a regional forest spatial plan.</p>	Retain the policy.	Accept in part
<b>S30.008</b>	Porirua City Council	Objective CC.5	Oppose	<p>While Council supports the intent of this objective, it is unclear what type of increase is being sought, an increase by 1ha would achieve this objective on the face of it. There needs to be more clarity about the extent of permanent forest that would meet this objective.</p> <p>The second half of the sentence does not assist the objective, and it is unclear what the intent is. This is the reason for the objective and not the objective itself.</p>	<p>Amend the objective so that it is clear what the outcome sought is, and/or reword as follows:</p> <p>By 2030, there is an increase in the area of permanent forest in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well-being.</p>		Reject
<b>FS25.013</b>	Peka Peka Farm Limited	Objective CC.5	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Allow	Reject

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S34.046	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Objective CC.5	Support in part	<p>Council supports a desire to increase cover, but is concerned about timeframe, balancing this against forecasted projections of growth and subsequent development over the next 10 years and willingness and ability to implement.</p> <p>It is also not identified how this will be achieved, measured and monitored by the policies and methods below.</p> <p>It is noted that the regulatory policy relating to this objective is a regional function.</p>	Amend to remove arbitrary timeframe and review policies associated with this objective to ensure that they can be achieved (as a Tier 1 Council under the NPS-UD) and that this is identified as a regional function only.		Accept in part
S79.005	South Wairarapa District Council	Objective CC.5	Support in part	<p>The particular concern from South Wairarapa is that afforestation will be used disproportionately in the Wairarapa sub-region. This has the potential to displace the significant economic drivers of our communities and then the social infrastructure and communities themselves.</p> <p>As noted in our submission on CC.2, it is fair to require reductions and mitigations to occur 'at source' in the first instance. The objective does not provide enough clarity to adequately demonstrate that.</p>	<p><i>[Note: Submission references prior Submission Point S79.002]</i></p> <p>No changes required if amendments to CC.2 are accepted. If relief is not accepted, then the following amendments are sought:</p> <p>By 2030, there is an increase in the area of permanent forest in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic wellbeing where:</p> <p><b>a. emissions are not able to be first reduced and;</b>  <b>b. afforestation is proportionate in extent to the remaining greenhouse emissions required after reduction; and</b>  <b>c. all environments contribute to natural sequestration of carbon.</b></p> <p>[End of suggested amendments]</p> <p>Or, similar relief to the same effect;</p> <p>AND; Any consequential amendments to give effect to the relief sought.</p>		Accept in part

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S82.002	Jonathan Markwick	Objective CC.5	Support in part	Consider incentivising native forests to support ecological and biodiversity goals.	Retain as notified.	Retain as notified.	Accept in part
S102.008	Te Tumu Paeroa   Office of the Māori Trustee	Objective CC.5	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.	Retain as notified.	Accept in part
S115.010	Hutt City Council	Objective CC.5	Support in part	Support intent. This objective can primarily be achieved only through the methods available to the regional council under s30 of the RMA, and through methods outside the resource management system.	Amend Objective CC.5 and associated methods to make clear that they only apply to regional councils. (See also relief sought for Method CC.4).		Accept in part
S123.007	Peter Thompson	Objective CC.5	Support	Allowing regeneration or planting of indigenous forest on highly erodible land will provide multiple benefits	Retain as notified.	Retain as notified.	Accept in part
S131.025	Ātiawa ki Whakaron gotai Charitable Trust	Objective CC.5	Support	Ātiawa supports the inclusion of Objective CC.5 in RPS Change 1. Ātiawa are pleased that an objective has been drafted to support permanent forest	Retain as notified.	Retain as notified.	Accept in part
FS29.296	Ngā Hapu o Otaki	Objective CC.5	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga</p>	Not stated	Not stated	Accept in part

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				and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.			
<b>S133.031</b>	Muaūpoko Tribal Authority	Objective CC.5	Support	Supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR  Alternative relief that may be necessary or appropriate to ensure Muaūpoko's connection to Te Whanganui-a-Tara is recognised.	Retain as notified. OR	Accept in part
<b>FS6.060</b>	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Objective CC.5	Oppose	We oppose this submission because as Muaūpoko claims are inappropriate. This not only causes confusion around which iwi are Tangata Whenua in Te Whanganui a Tara rohe and which iwi to engage with, but also portrays a false perception of who the mana whenua are, which is also inappropriate.	Disallow  We seek that this part of the submission is disallowed.	Disallow	Reject
<b>FS20.378</b>	Ātiawa ki Whakaron gotai Charitable Trust	Objective CC.5	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.	Disallow  Disallow the whole submission	Disallow	Reject
<b>S137.058</b>	Greater Wellington	Objective CC.5	Support in part	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land,	Review and, where necessary, amend the		Accept

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	Regional Council (GWRC)			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.	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.		
<b>FS30.031</b>	Beef + Lamb New Zealand Ltd	Objective CC.5	Support in part	B+LNZ supports the intent of GWRC's submission to clarify that the objectives and policies 'are not intended to support unfettered afforestation across the region with the sole purpose of providing a carbon sink'. However, B+LNZ maintains significant concern with the drafting of these provisions and seek that they are withdrawn and redrafted when national legislation is completed. B+LNZ considers GWRC's submission points to highlight the need for well thought out provisions relating to climate change based on science and an understanding of the implications for productive land use and the rural community.	Allow in part	Allow in part	Accept
<b>FS13.009</b>	Wellington City Council	Objective CC.5	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow	Allow	Accept
<b>FS14.007</b>	Masterton District Council	Objective CC.5	Support in part	Agree with:  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.	Not stated  Agree with relief sought: 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.	Not stated	Accept
<b>S140.011</b>	Wellington City Council (WCC)	Objective CC.5	Support	Support as proposed.	Support as proposed.	Support as proposed.	Accept
<b>S144.011</b>	Sustainable Wairarapa Inc	Objective CC.5	Support	As for Policy CC6. Changing land-use from pasture to permanent forest is an essential part of using nature-based solutions for managing freshwater. it helps to reduce sediment transport. By providing a natural store for water it reduces flood peaks and helps with flow attenuation.	Support as proposed.	Retain as notified.	Accept
<b>S158.007</b>	Kāinga Ora Homes and	Objective CC.5	Support in part	Supports this objective, the objective is not measurable as to what extent permanent forest in the region is increase by.  A definition for carbon sequestration should also be provided.	Amend the objective to become measurable as follows:		Accept in part

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	Communities				<p>By 2030, there is an increase in the area of permanent forest in the Wellington Region of <b>10%</b>, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well-being.</p> <p>AND</p> <p>Include a definition for carbon sequestration. <b>Carbon sequestration is the process of capturing, securing and storing carbon dioxide from the atmosphere through means such as maintaining, protecting and planting forest areas.</b></p>		
<b>S163.016</b>	Wairarapa Federated Farmers	Objective CC.5	Oppose	The intent of this objective should be to optimise an increase in forests/trees across diverse values and uses (e.g. permanent or plantation forests, continuous canopy forests, agro-forestry), rather than maximise any one element.	<p>That Objective CC.5 be deleted</p> <p>Delete the FW icon</p>		Reject
<b>FS7.060</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Objective CC.5	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	<p>Disallow</p> <p>Disallow whole submission</p>	Disallow	Accept
<b>FS20.182</b>	Ātiawa ki Whakaron gotai Charitable Trust	Objective CC.5	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	<p>Disallow</p> <p>Disallow the entire submission by Wairarapa Federated Farmers.</p>	Disallow	Accept
<b>FS29.033</b>	Ngā Hapu o Otaki	Objective CC.5	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when</p>	Not stated	Not stated	Accept

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				<p>considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>			
FS30.089	Beef + Lamb New Zealand Ltd	Objective CC.5	Support	<p>B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.</p>	Allow	Allow	Reject
S165.007	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Objective CC.5	Support	<p>Controlling deer, goats and other browsers on regenerating native vegetation could</p> <p>have significant carbon benefits. [4]</p> <p>[Note 4 references - <a href="https://www.doc.govt.nz/globalassets/documents/conservation/threats-and-impacts/animal-pests/wild-animal-control-emissions-management.pdf">https://www.doc.govt.nz/globalassets/documents/conservation/threats-and-impacts/animal-pests/wild-animal-control-emissions-management.pdf</a>]</p> <p>Permanent forests become emitters of carbon if browsing herbivores are not managed [5]</p> <p>[Note 5 references - <a href="https://www.forestandbird.org.nz/resources/climate-change-and-introduced-browsers">https://www.forestandbird.org.nz/resources/climate-change-and-introduced-browsers</a>]</p>	<p>Retain with amendment:</p> <p>By 2030, there is an increase in the area of <b>permanent forest</b> in the Wellington Region, <b>and an equivalent increase in browser control</b>, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well-being</p>	Retain with amendment:	Accept in part
FS30.053	Beef + Lamb New Zealand Ltd	Objective CC.5	Oppose	<p>B+LNZ considers that the wording 'equivalent increase in browser control' is unclear and the intent does not recognise, assess, or consider the benefit vs cost of such an objective.</p>	Disallow	Disallow	Reject
FS30.319	Beef + Lamb New Zealand Ltd	Objective CC.5	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	Disallow	Disallow	Reject
S166.007	Masterton District Council	Objective CC.5	Support in part	<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>	<p>Retain as notified.</p> <p>However:</p> <p>MDC asks that it has a lead role in the development of</p>	Retain as notified.	Accept in part

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					any plans or policies relating to the increase of permanent forest in the Wellington Region, particularly in the Masterton District.		
S167.022	Taranaki Whānui	Objective CC.5	Support	Taranaki Whānui supports Objective CC.5 and notes it is intended to work with other proposed provisions in RPS1 aimed at reducing gross emissions to be most effective in supporting Objectives CC.1 and CC.3.	Retain as notified.	Retain as notified.	Accept in part
S170.011	Te Rūnanga o Toa Rangatira	Objective CC.5	Not Stated / Neutral	Objective CC.5 is powerful in the sense that a Regional Policy Statement could impact the behavior strongly- however the Objective is implemented with Policy CC.19 climate change adaptation strategies which is a non-regulatory instrument. Can this objective be used in land use planning practices?	Clarifications to address the relief sought.		Accept in part
FS29.125	Ngā Hapu o Otaki	Objective CC.5	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>	Not stated	Not stated	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
<b>S168.0109</b>	Rangitāne O Wairarapa Inc	Objective CC.5	Support in part		Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it has to be a no-cost solution).		Accept in part
<b>FS31.034</b>	Sustainable Wairarapa inc	Objective CC.5	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>	Not stated	Not stated	Accept in part
<b>S168.0113</b>	Rangitāne O Wairarapa Inc	Objective CC.5	Support in part	Rangitāne o Wairarapa strongly support the objective to increase the area of permanent forest in the Wellington region; but consider that the objective should be targeted at indigenous forest. Increasing the area of permanent indigenous forest will also have benefits for cultural wellbeing, which should be acknowledged.	Amend the objective so that it is focused on indigenous forest and insert a reference to cultural wellbeing.		Accept
<b>FS31.039</b>	Sustainable Wairarapa inc	Objective CC.5	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of</p>	Not stated	Not stated	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				<p>the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>			
<b>S16.092</b>	Kāpiti Coast District Council	Permanent forest	Oppose	The definition includes a qualifier that relies on the intention of the owner of the forest. Council notes it is difficult to enforce provisions that contain such qualifiers - confirming and enforcing the intention of a person or persons is not possible under the RMA.	Amend as follows:  For the purpose of the RPS permanent forest is a forest established for long term forest cover and <del>that</del> is not intended to be harvested.		Accept in part
<b>S30.0109</b>	Porirua City Council	Permanent forest	Oppose	<p>This definition should draw from and be consistent with the terminology contained in the NES-PF, which in itself regulates plantation forestry. For instance, the definition could be reworded to include plantation forestry as a specific exclusion. It could also include an exclusion of any other harvesting that is not within the NES-PF.</p> <p>Remove "for the purpose of the RPS" from the start of the definition, as this is superfluous when it is a definition in the RPS.</p> <p>There is already a definition for plantation forestry in the NES-PF. To introduce a separate definition to that of the NES-PF would be confusing and potentially lead to inconsistency. Where the term plantation forestry is used in the RPS, it needs to be done so in a manner that is consistent with the NES-PF, which is a higher level RMA document than the RPS.</p>	<p>Amend the definition so that it uses the same terminology as in the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.</p> <p>Remove "for the purpose of the RPS" from the start of the definition, as this is superfluous when it is a definition in the RPS.</p> <p>Delete definition and replace it with the definition from the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017</p>		Accept in part
<b>FS25.025</b>	Peka Peka Farm Limited	Permanent forest	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S163.0110	Wairarapa Federated Farmers	Permanent forest	Oppose	Defer to the 2024 RPS review  Further reasons set out in our relief on Objective CC.5 and Policy CC.6	Delete the new definition  Delete the FW icon		Accept in part
FS7.051	Royal Forest and Bird Protection Society (Forest & Bird)	Permanent forest	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept in part
FS20.173	Ātiawa ki Whakaron gotai Charitable Trust	Permanent forest	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
FS29.024	Ngā Hapu o Otaki	Permanent forest	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated		Accept in part
FS30.080	Beef + Lamb New Zealand Ltd	Permanent forest	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Accept in part
S16.091	Kāpiti Coast District Council	Plantation forestry	Oppose	Council considers the definition should align with that used in the NES-PF. In the absence of amendments to ensure consistency with the NES-PF the proposed definition captures orchards and other similar activities.	Amend to align with the NES-PF definition for plantation forestry.		Accept
S30.0126	Porirua City Council	Plantation forestry	Oppose	There is already a definition for plantation forestry in the NES-PF. To introduce a separate definition to that of the NES-PF would be confusing and potentially lead to inconsistency. Where the term plantation forestry is used in the RPS, it needs to be done so in a manner that is consistent with the NES-PF, which is a higher level RMA document than the RPS	Delete definition and replace it with the definition from the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS25.044	Peka Peka Farm Limited	Plantation forestry	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept
S163.0111	Wairarapa Federated Farmers	Plantation forestry	Oppose	Defer to the 2024 RPS review  Further reasons set out in our relief on Objective CC.5 and Policy CC.6	Delete the new definition  Delete the FW icon		Reject
FS7.052	Royal Forest and Bird Protection Society (Forest & Bird)	Plantation forestry	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept in part
FS20.174	Ātiawa ki Whakaron gotai Charitable Trust	Plantation forestry	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
FS29.025	Ngā Hapu o Otaki	Plantation forestry	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated		Accept
FS30.081	Beef + Lamb New Zealand Ltd	Plantation forestry	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
S16.074	Kāpiti Coast District Council	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		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S30.085	Porirua City Council	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.		Reject
FS25.118	Peka Peka Farm Limited	Policy FW.8: Land use adaptation - non-regulatory	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Reject
S34.016	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy FW.8: Land use adaptation - non-regulatory	Oppose in part	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.  Territorial authorities are unlikely to have the expertise or resources to support this.  Farm plans under clause (b) are also not defined and this could have range of requirements.	Clarify policy and define farm plans or delete clause (b).	Awaiting recommendation	Accept in part
S115.087	Hutt City Council	Policy FW.8: Land use adaptation - non-regulatory	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.	Awaiting recommendation	Reject
S128.053	Horticulture New Zealand	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 <b>or lower emissions</b> land uses and pathways to move to new land uses.	Awaiting recommendation	Accept
FS2.14	Rangitāne o Wairarapa Inc	Policy FW.8: Land use adaptation - non-regulatory	Support	Rangitāne are concerned at the urgency at which greenhouse gas emission reductions must be achieved and land use change is one option. Rangitāne supports the inclusion of the reference to 'lower emissions'.	Allow		Accept
S140.088	Wellington City Council (WCC)	Policy FW.8: Land use adaptation - non-regulatory	Support in part	For better consistency and guidance of land use adaption, 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.	Awaiting recommendation	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
<b>S144.048</b>	Sustainable Wairarapa Inc	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.	Awaiting recommendation	Accept
<b>S147.081</b>	Wellington Fish and Game Council	Policy FW.8: Land use adaptation - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.	Awaiting recommendation	Accept
<b>FS19.145</b>	Wellington Water Ltd ("Wellington Water")	Policy FW.8: Land use adaptation - non-regulatory	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS.  Most of the amendments sought do not in any event properly reflect the NPSFM.  In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.  Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.  Some of the amendments undermine the more detailed content of PC1.	Disallow	Awaiting recommendation	Reject
<b>FS30.250</b>	Beef + Lamb New Zealand Ltd	Policy FW.8: Land use adaptation - non-regulatory	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow  That the submission be disallowed with the exception of 147.007	Awaiting recommendation	Reject
<b>S163.084</b>	Wairarapa Federated Farmers	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.	Awaiting recommendation	Reject
<b>FS2.36</b>	Rangitāne o Wairarapa Inc	Policy FW.8: Land use adaptation - non-regulatory	Oppose	Rangitāne strongly opposes the relief sought by the submitter. Climate change will impact people and environments differently. Tangata whenua are among the population groups most at risk of the impacts of climate change. Our indigenous biodiversity, mahinga kai and taonga species are more vulnerable to environmental change such as increased temperatures and extreme rainfall. Climate change effects will greatly impact indigenous	Disallow		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				ecosystems and the ability for nature-based solutions to thrive and support communities. Rangitāne are concerned at the urgency at which greenhouse gas emission reductions must be achieved and providing for these types of land use change is one way to achieve this.			
<b>FS7.127</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Policy FW.8: Land use adaptation - non-regulatory	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Awaiting recommendation	Accept in part
<b>FS20.249</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy FW.8: Land use adaptation - non-regulatory	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Awaiting recommendation	Accept in part
<b>FS29.100</b>	Ngā Hapu o Otaki	Policy FW.8: Land use adaptation - non-regulatory	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated	Awaiting recommendation	Accept
<b>FS30.156</b>	Beef + Lamb New Zealand Ltd	Policy FW.8: Land use adaptation - non-regulatory	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Awaiting recommendation	Reject
<b>S165.088</b>	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy FW.8: Land use adaptation - non-regulatory	Support		Retain	Awaiting recommendation	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS30.319	Beef + Lamb New Zealand Ltd	Policy FW.8: Land use adaptation - non-regulatory	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Awaiting recommendation	Reject
S131.0113	Ātiawa ki Whakaron gotai Charitable Trust	Policy FW.8: Land use adaptation - non-regulatory	Support	Ātiawa supports this policy	Retain as notified.	Awaiting recommendation	Accept
FS29.229	Ngā Hapu o Otaki	Policy FW.8: Land use adaptation - non-regulatory	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga</p>	Not stated	Awaiting recommendation	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.			
<b>S165.0146</b>	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy FW.8: Land use adaptation - non-regulatory	Support		Retain	Awaiting recommendation	Accept
<b>FS30.319</b>	Beef + Lamb New Zealand Ltd	Policy FW.8: Land use adaptation - non-regulatory	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Awaiting recommendation	Reject
<b>S167.0131</b>	Taranaki Whānui	Policy FW.8: Land use adaptation - non-regulatory	Support	Taranaki Whānui supports Policy FW.8.	Retain as notified.	Awaiting recommendation	Accept
<b>S16.025</b>	Kāpiti Coast District Council	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	If the identification of specific nature-based solutions is an exercise GWRC wishes to undertake, whilst Council does not oppose its concept, Council notes it is not supported by the RMA or any higher- level statutory planning document. Council requests the policy is either deleted entirely or amended so it is only applicable to regional councils. Council does not consider the approach can be justified under section 32 for inclusion in a district plan.	Delete Policy CC.12 entirely or amend so it is only applicable to regional councils.		Accept in part
<b>FS20.048</b>	Ātiawa ki Whakaron gotai	Policy CC.12: Protect,	Oppose	Ātiawa are disappointed with the regressive approach taken by Kāpiti Coast District Council in regard to nature based solutions to climate change. It is evident that current approaches to managing the environment	Disallow		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
	Charitable Trust	enhance and restore ecosystems that provide nature-based solutions to climate change - consideration		are inadequate, and that options such as nature-based solutions could provide better outcomes, culturally, socially and economically. While nothing in legislation specifically requires local authorities to consider nature-based solutions, the RMA (s7) and the NPS-UD (Objective 8, Policy 1, Policy 6) all require local authorities to have particular regard to the effects of climate change in resource management decision making and provide well-functioning urban environment that are resilient to the effects of climate change, which could include options such as nature-based solutions and mātauranga Māori.			
<b>S30.060</b>	Porirua City Council	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	<p>Council opposes Policy CC.12 and seeks its deletion for the following reasons:</p> <ul style="list-style-type: none"> <li>• This policy is unclear as to its intent and how it is supposed to be engaged for resource consents, plan changes/variations or reviews.</li> <li>• It relies on definitions for "nature-based solution", "climate change adaptation" and "climate change mitigation" which lack the necessary specificity, certainty and clarity required for terms used in a RMA regulatory framework (see Council submission points on these definitions).</li> <li>• Due to uncertainty created by the definitions combined with the low effects threshold, application of this policy as a consideration will have a regulatory reach that has not been justified by the s32 evaluation.</li> <li>• The requirement to avoid adverse effects is a high regulatory bar considering the definition of 'nature-based solution' applies to everything from estuaries and rivers to street trees. "Avoid" is a higher regulatory bar than that sought by the RPS for SNA which provides for the application of the effects management hierarchy.</li> <li>• Includes an effects threshold unrelated to the outcome sought in Objective CC.4.</li> <li>• This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans.</li> </ul>	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives, and amend policy to only apply to resource consents.		Accept in part
<b>FS25.093</b>	Peka Peka Farm Limited	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		solutions to climate change - consideration					
S34.045	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose in part	<p>It is unclear what the intent of this provision is, regarding climate change mitigation or adaptation functions. Is this intending to address existing nature-based solutions or future planned solutions?</p> <p>It is also unclear how territorial authorities are supposed to identify these effects, the scale of the effects and ensure that they are avoided.</p> <p>Council does not oppose the intent of what the RPSPC1 is trying to achieve but considers that this places an onerous burden on territorial authorities and applicants.</p> <p>See our notes on Objective CC.4 for comments regarding clarity of the definition of nature-based solutions.</p>	<p>Delete policy in its entirety.</p> <p>See also comments on Policy CC.7 and Objective CC.4.</p>		Accept in part
S79.040	South Wairarapa District Council	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	<p>The policy needs to provide more certainty around whether it applies to natural features that form part of climate mitigation or those which are created. For example, existing plantation forests, or existing indigenous forest, or artificial wetlands created to mitigate the effects of climate change.</p>	<p>Amend Policy CC.12 as follows:</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may adversely affect a nature-based solution <b>established mitigate the effects of</b> to climate change and particular regard shall be given to avoiding adverse effects on the climate change mitigation or adaptation functions <b>of that solution.</b></p> <p>[End of amendment to Policy CC.12]</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential</p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					amendments to give effect to the relief sought		
<b>S102.023</b>	Te Tumu Paeroa   Office of the Māori Trustee	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.		Accept in part
<b>S115.061</b>	Hutt City Council	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	The definitions of relevant terms including "nature-based solution", "climate change adaptation", and "climate change mitigation" are not clear enough to implement this policy. In addition, it does not adequately set situations or thresholds where this assessment should occur.	Delete new Policy CC.12		Accept in part
<b>S123.006</b>	Peter Thompson	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Nature-based solutions are key to dealing with the impacts of climate change.	Retain as notified.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S123.016	Peter Thompson	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support		Retain as notified.		Accept in part
S131.085	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	<p>Ātiawa supports the protection, enhancement and restoration of ecosystems, Ātiawa acknowledge the significant benefits that ecosystems and nature-based solutions provide to climate change and natural hazards.</p> <p>The wording of the policy does not provide a strong mechanism to protect, enhance and restore ecosystems. We do not think is appropriate, we seek clear policy direction to ensure biodiversity is protected, enhanced and restored.</p>	<p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to: <b>a) protecting ecosystems from adverse effects of an activity on climate change mitigation or adaptation functions and; b) enhance or restoring ecosystems where the ecosystem health is in a degraded state in order to for nature-based solutions to provide climate change mitigation or adaptation functions. Priority shall be given to actions that provide the greatest cobenefits for climate change mitigation and adaptation, indigenous biodiversity, fresh and coastal water.</b> a determination shall be made as to whether an activity may adversely affect a nature-based solution to climate change and particular regard shall be given to avoiding adverse effects on the</p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					climate change mitigation or adaptation functions		
<b>FS29.355</b>	Ngā Hapu o Otaki	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degredation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>	Not stated		Accept in part
<b>S133.046</b>	Muaūpoko Tribal Authority	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	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.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
<b>FS20.393</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	<p>Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.</p>	Disallow	Disallow the whole submission	Reject
<b>S140.062</b>	Wellington City Council (WCC)	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	<p>Intent and requirements of policy is unclear and confusing in terms of how it can be feasibly implemented given the policy has used broad and unclear terms.</p> <p>This includes avoiding doing activities in constructed wetlands and rain gardens as they are included in the definition of nature-based solutions.</p> <p>Additionally, the accompanying definitions do not provide any further clarity for the Policy. This is addressed below.</p>	Clarify and refine policy wording to provide greater certainty of how this policy will be implemented.		Accept in part
<b>S144.009</b>	Sustainable Wairarapa Inc	Policy CC.12: Protect, enhance	Support	<p>Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services, such as flood retention and carbon sequestration is more likely to have the long-term benefits required</p>	Retain as notified.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		and restore ecosystems that provide nature-based solutions to climate change - consideration					
<b>S144.021</b>	Sustainable Wairarapa Inc	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services, such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.		Accept in part
<b>S147.065</b>	Wellington Fish and Game Council	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.		Accept in part
<b>FS19.129</b>	Wellington Water Ltd ("Wellington Water")	Policy CC.12: Protect, enhance and restore ecosystem	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS.  Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.	Disallow		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		s that provide nature-based solutions to climate change - consideration		Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.  Some of the amendments undermine the more detailed content of PC1.			
<b>FS30.234</b>	Beef + Lamb New Zealand Ltd	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	That the submission be disallowed with the exception of 147.007	Reject
<b>S148.028</b>	Wellington International Airport Ltd (WIAL)	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	Not sufficiently clear as to what a nature based solution to climate change involves. It would be inappropriate for this policy to unduly constrain regionally significant infrastructure and its associated development due to such uncertainty.	Delete this policy.		Accept in part
<b>FS4.3</b>	CentrePort Limited	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-	Support	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change – consideration	Allow	the concept of nature based solutions is unclear and the policy creates uncertainty for regionally significant infrastructure, particularly as	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		based solutions to climate change - consideration				adverse effects are to be avoided.	
<b>FS7.015</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	It is not appropriate for the airport and aviation industry to be exempt from these policies.	Disallow		Accept
<b>FS8.017</b>	Guardians of the Bays Inc	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	Policy CC.12: Protect, enhance and restore ecosystems that provide nature based solutions to climate change should be retained. We support strengthening this policy	Disallow		Accept
<b>S163.066</b>	Wairarapa Federated Farmers	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate	Oppose	The proposed definition of "nature based solutions" refers specifically to the actions people take (eg, planting trees) and not to the trees themselves, ie, the policy seems confused on this point. To the extent that Council's intent is look after the trees (and wetlands etc), we suggest these are already comprehensively covered by existing regional and national RMA instruments.	That Policy CC.12 be deleted Delete the FW icon.		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		change - consideration					
<b>FS7.109</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept in part
<b>FS20.231</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
<b>FS29.082</b>	Ngā Hapu o Otaki	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS30.138	Beef + Lamb New Zealand Ltd	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
S165.066	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Support recognising and providing for nature-based solutions, however stronger policy direction must be included. A direction to have "particular regard" is not strong enough, as it provides latitude for decision-makers to give little or no weight at all to such critical matters at the planmaking or consenting stage.	Amend as follows:  When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may adversely affect a nature-based solution to climate change and <del>particular regard shall be given to avoiding</del> <b>any</b> adverse effects on the climate change mitigation or adaptation functions must be avoided.		Accept in part
FS8.018	Guardians of the Bays Inc	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Support stronger policy direction and the removal of wording proposed by Forest and Bird.	Allow		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS17.0010	Wellington International Airport Limited ("WIAL")	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission and it may unduly constrain development associated with the Airport as regionally significant infrastructure, owned and operated by WIAL	Disallow		Reject
FS30.319	Beef + Lamb New Zealand Ltd	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
S170.091	Te Rūnanga o Toa Rangatira	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Not Stated / Neutral	<p>Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.			
<b>FS29.205</b>	Ngā Hapu o Otaki		Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making – Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 – Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>	Not stated		Accept in part
<b>S167.0101</b>	Taranaki Whānui	Policy CC.12: Protect, enhance and restore ecosystem	Support	Taranaki Whānui supports the principle of new Policy CC.12, noting in particular that it is informed by Method CC.9 and therefore Method IE.2	Retain as notified.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		s that provide nature-based solutions to climate change - consideration					
<b>S168.0125</b>	Rangitāne O Wairarapa Inc	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Rangitāne o Wairarapa support the provision for nature-based solutions to climate change, however, the policy as currently worded, does not 'protect' them, as is stated in the explanatory text. We request that this policy includes more direction about how nature-based solutions should be protected, including for example through mechanisms such conditions. It is not sufficient for nature-based solutions to be simply a 'consideration' to which 'particular regard' is made through a resource consent, notice of requirement, change, variation or review of a district or regional plan.	Amend the policy to provide stronger protection for nature-based solutions, given the importance of such solutions in the region's climate change response.		Accept in part
<b>FS31.052</b>	Sustainable Wairarapa inc	CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.  Nga mihi nui Ian Gun	Not stated		Accept in part
<b>FS17.011</b>	Wellington Internation	Policy CC.12: Protect,	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission and it may unduly constrain development associated with the	Disallow	WIAL oppose the relief sought as it is inconsistent with	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
	al Airport Limited ("WIAL")	enhance and restore ecosystems that provide nature-based solutions to climate change - consideration		Airport as regionally significant infrastructure, owned and operated by WIAL.		WIAL's primary submission and it may unduly constrain development associated with the Airport as regionally significant infrastructure, owned and operated by WIAL.	
<b>S168.0126</b>	Rangitāne O Wairarapa Inc	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Rangitāne o Wairarapa seek that this policy is cross-referenced with Policy 52 to reflect the priority of soft engineering over hard engineering solutions in achieving nature-based solutions.	Provide a cross-reference to Policy 52 in this policy, to reflect the priority that soft engineering solutions should be given over hard engineering solutions, in order to provide for and protect nature-based solutions.		Accept in part
<b>FS31.053</b>	Sustainable Wairarapa inc	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.	Not stated		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				Nga mihi nui lan Gun			
<b>FS23.008</b>	Transpower New Zealand Limited	Policy CC.14: Climate-resilient urban areas - consideration	Support	Transpower agrees with the reasoning provided by the submitter as to the practical concerns and issues with the policy as proposed. Specific to the National Grid, it is inappropriate to create green spaces underneath the National Grid lines on the basis vegetation can pose health and safety issues as well as pose an operational risk to the National Grid. The policy as proposed does not clearly articulate the outcomes sought and how they are to be achieved and as drafted, clause (a) and (d) would apply to a resource consent application associated with the National Grid.	Allow		Accept
<b>FS25.095</b>	Peka Peka Farm Limited	Policy CC.14: Climate-resilient urban areas - consideration	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept
<b>S16.027</b>	Kāpiti Coast District Council	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	<p>With the exceptions of the principles of water sensitive urban design and the requirement for capturing and storing rainwater via rainwater tanks, the policy demonstrates a lack of understanding of district planning, urban planning processes and procedures, and the limits of regulatory intervention in a district plan in the absence of legislative mandate.</p> <p>Council considers the policy should be deleted in favour of non-regulatory methods that would encourage and incentivise the desired outcomes including:</p> <ul style="list-style-type: none"> <li>• Enhancing, maintaining and creating urban greening to provide urban cooling.</li> <li>• A suburb-scale tree canopy cover target of 10% by 2030 and 30% cover by 2050.</li> <li>• Restoration and enhancement of natural ecosystems.</li> <li>• Efficient use of energy and water in buildings and infrastructure.</li> <li>• Buildings infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.</li> </ul> <p>The drafting of RPS Change 1 does not suitably account for the limitations that legislation creates on district plans, and on resource consent decision-making by city and district councils. Had the section 32 evaluation considered this policy and the suggested tasks in detail it would have identified that:</p> <ul style="list-style-type: none"> <li>• The resilience of buildings is a matter addressed by the Building Act and its associated regulations.</li> <li>• District plans do not prevent water and energy efficient design of buildings. Therefore, it is unclear why district plans would need to be changed to provide for them.</li> <li>• The enhancement and restoration of natural ecosystems are not activities that can be required under a district plan. District and city council</li> </ul>	<p>Delete Policy CC.14.</p> <p>Investigate the use of non-regulatory methods to achieve the stated goals outside of the RPS.</p>		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				<p>functions under the RMA require the maintenance of indigenous biodiversity. Therefore, restoration and enhancement of the natural ecosystems is best achieved via non-regulatory incentives and support.</p> <ul style="list-style-type: none"> <li>• Tree coverage targets for suburban areas to provide urban cooling conflicts with development enabled by the MDRS. It is also unclear how a district plan could require contributions of tree planting in urban areas to achieve the stated targets, which Council notes has no statutory basis or convincing evidence base to support them. The use of non-regulatory methods should be the option pursued by GWRC, working in partnership with city and district councils rather attempting regulatory methods that are not supported by legislation.</li> </ul>			
<b>FS20.049</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	Ātiawa strongly oppose Kāpiti Coast District Council's reasoning, giving effect to Te Mana o te Wai is required by the NPS-FM. The impacts of urban development on freshwater ecosystems, including Te Mana o te Wai must be considered by resource management decision-makers. While the suggestions put forward by Kāpiti Coast District Council would have benefit for te taiao, however they would not fulfil the requirements set out by the NPS-FM.	Disallow		Accept
<b>S25.037</b>	Carterton District Council	Policy CC.14: Climate-resilient urban areas - consideration	Support	CDC supports this policy but notes that (f) is better addressed via the Building Act framework, rather than through RMA processes. Request deletion of clause (f).	<p>Amend the policy as follows:</p> <p>Policy CC.14: Climate-resilient urban areas – consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, provide for actions and initiatives, particularly the use of nature-based solutions, that contribute to climate resilient urban areas, including:</p> <p>...</p> <p><del>(f) buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.</del></p>		Accept in part
<b>S30.062</b>	Porirua City Council	Policy CC.14: Climate-resilient urban areas -	Oppose	<p>Council opposes Policy CC.14 and seeks its deletion. Issues of concern include:</p> <ul style="list-style-type: none"> <li>• It relies on a definition for "nature-based solution" which lacks the necessary specificity, certainty and clarity required for terms used in a RMA regulatory framework (see Council submission point on this definitions).</li> </ul>	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		consideration		<ul style="list-style-type: none"> <li>• It relies on a number of terms that have not been defined. These include "climate-resilient urban area", "urban greening", "urban cooling", "water sensitive urban design", "resilience". The lack of definitions for these terms creates uncertainty for applicants, councils, and other stakeholders.</li> <li>• The policy includes requirements that will not be within the knowledge of the consent authority or applicants, for example suburb-scale tree canopy cover.</li> <li>• The policy would require councils to undertake assessments of tree cover regularly and assess applications against their impact of the current knowledge base, which may be altered by resident action, such as removing trees (either legally or illegally). This would be onerous on both council's and applicants.</li> <li>• The policy duplicates controls under other statutes and regulations such as the Building Code.</li> <li>• Relies on application of tests for which no policy guidance has been provided to determine when these are met. Examples include; "strengthen" in (d), "efficient" in (e), "withstand" in (f).</li> <li>• Clause (f) does not specify the timeline for "predicted" nor whose prediction is to be applied. The clause duplicates the Building Code.</li> <li>• No threshold is included and as drafted would apply to all resource consents, change, variation or review of RMA plans regardless of scale and type of activity. For example, a dormer window breaching a height in relation to boundary standard in a district plan may trigger this policy consideration. As such the policy will have a regulatory reach that has not been justified by the s32 evaluation.</li> <li>• In regard to (a), why are these targets not included in the relevant objective? Further, is there data available to assess this against?</li> <li>• In regard to (c), it is unclear what sort of targets are meant. This needs to be reframed to acknowledge can only address new development. What does "provide for actions and initiatives" mean in a consent process? This needs to be thought through into what this actually means in terms of implementation. How are we supposed to have regard to this?</li> <li>• In regard to (f), this is most appropriately handled under the building act and other acts determining the design resilience of different pieces of infrastructure (such as Electricity (Safety) Regulations 2010) and any amendments needed to capture the resilience of new buildings to predicted environmental changes. The Building Act already has requirements for different resilience elements (salt spray, wind zones etc.). These are regularly updated. Similarly there are engineering standards for a wide range of infrastructure to ensure that it is resilient. Assessment of applications may not be the most effective way of implementing resilience in that area.</li> </ul> <p>GWRC also need to consider how the canopy cover policy aligns with the restrictions under s76(4A), whereby territorial authorities cannot include rules in their plans that prohibit or restrict the felling, trimming, damaging or removal of a tree or trees on a single urban environment allotment, unless the tree(s) are described in a schedule in the district plan, which includes a description of the tree(s) and the specific street address or legal description. While territorial authorities may be able to include rules requiring canopy cover for new development, they are unable to then</p>			

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				prevent the removal of those trees, without complying with the requirements of s76 RMA.			
S34.010	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	<p>There appears to be no clear legislative or policy statement support for requiring the implementation of the specific measures proposed within this policy.</p> <p>The policy also contains several terms that are not clearly defined or clarified, e.g., 'urban greening' and requirements that neighbourhood scale infrastructure is provided for at all scales of development, with no direction on what threshold should be applied to these requirements.</p> <p>Council notes that the Section 32 report identifies that nature-based solutions are an important response to climate change adaptation and mitigation, but it is not considered that this meets the test of Section 32 (1) (b) of the RMA – that there has been sufficient examination on "whether the provisions in the proposal are the most appropriate way to achieve the objectives".</p> <p>In respect of the individual clauses:</p> <p>Clause (a) – it is unclear how this can be achieved, measured and monitored. It is noted that in some areas there is more than 10% canopy already, and many trees may not grow quickly enough to achieve the canopy requirements by 2030. It is also noted that 'tree canopy cover' is a very selective term which discounts a number of vegetation types which could contribute positively to the intent of the policy and the higher order objective but have been excluded by the use of the term 'canopy'. Council further notes that the requirements for tree canopy cover are at odds with NPS-UD, as canopy cannot work with townhouses, and it is impractical to rely solely on street trees to achieve this measure.</p> <p>Clause (c): It is not considered appropriate to set, nor does there appear to be sufficient evidence, legislative support or justification for the setting of, targets for urban roof area rainwater collection in district plans. This also ignores that there could be other nature-based solutions that may support other objectives e.g., hydraulic neutrality and open space requirements in urban areas, through methods such as green rooves or rooftop gardens.</p> <p>Clauses (b) and (c), natural water systems and capturing rainwater at a community level and rainwater tanks require space, which may not be available in an urban context. It may also be a resource burden that Council is not appropriately funded or resourced to maintain.</p> <p>Regarding clauses (e) and (f), it is unclear why the proposed provisions include requirements in district plans (or when considering consents) to address water use in buildings, and that buildings are able to withstand the effects of climate change.</p> <p>The proposed provisions do not address how this could be achieved in district plans, nor does there appear to be a higher order document that supports this. These provisions seem to be more appropriately dealt with through the Building Act.</p>	Delete policy CC.14 in its entirety and consider non regulatory methods as a means of compliance to achieve policy CC.4.		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S63.010	Mary Beth Taylor	Policy CC.14: Climate-resilient urban areas - consideration	Support	Rain water harvesting and storage and renewable generation must be normalised.	Retain as notified.		Accept in part
S95.009	Tony Chad	Policy CC.14: Climate-resilient urban areas - consideration	Support	Rain water harvesting and storage and renewable generation must be normalised.	Retain as notified.		Accept in part
S102.025	Te Tumu Paeroa   Office of the Māori Trustee	Policy CC.14: Climate-resilient urban areas - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.		Accept in part
S113.028	Wellington Water	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	<p>Simplify for clarity, and be clear that any water in urban areas that is not provided by Wellington Water should only be used for non- potable uses to ensure good public health outcomes.</p> <p>Also, it is unclear what 'community scale' means - if this involves creation of an additional network for vesting, Wellington Water may oppose the clause in its entirety.</p>	<p>Amend clause (c) as follows:</p> <p><del>(c) capturing, storing and recycling</del> <b>harvesting</b> water at a community- scale for non-potable uses (for example by requiring rain tanks, and setting targets for urban roof area rainwater collection)</p> <p>OR</p> <p>Delete the clause in its entirety.</p>		Accept
S115.063	Hutt City Council	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	<p>The principles for water sensitive urban design (clause (b)) and rainwater retention (clause (c)) duplicate the freshwater-specific policies and should be deleted.</p> <p>The remaining matters cannot be achieved through the regulatory means available to territorial authorities. As such, if this policy is retained, we seek an amendment to clarify that the policy applies to regional plans only.</p>	<ul style="list-style-type: none"> <li>Delete new Policy CC.14, or</li> <li>Amend the policy to remove clauses (b) and (c) and clarify that the policy only applies to regional plans.</li> </ul>		Reject
S123.017	Peter Thompson	Policy CC.14: Climate-resilient	Support	The target of 10 percent tree canopy cover at a suburb-scale is useful.	Retain as notified.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		urban areas - consideration					
<b>S131.087</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.14: Climate-resilient urban areas - consideration	Support	Ātiawa supports providing for actions and initiatives (including nature-based solutions) to contribute to climate resilient urban areas.	Retain as notified.		Accept in part
<b>FS29.357</b>	Ngā Hapu o Otaki	Policy CC.14: Climate-resilient urban areas - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degredation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>	Not stated		Accept in part
<b>S132.006</b>	Toka Tu Ake EQC	Policy CC.14: Climate-resilient urban areas -	Support	As above	Strengthen, especially regards areas intensified through the NPS-UD		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		consideration					
<b>S133.048</b>	Muaūpoko Tribal Authority	Policy CC.14: Climate-resilient urban areas - consideration	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.		Accept in part
<b>FS20.395</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.	Disallow	Disallow the whole submission	Reject
<b>S137.010</b>	Greater Wellington Regional Council (GWRC)	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Amendments are required to improve readability and clarity.	Amend Policy CC.14 as follows: ... (a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working and work towards achieving a target of 10		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050....  (f) <b>promoting</b> buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.		
<b>S140.064</b>	Wellington City Council (WCC)	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	This "provide for" policy is unclear how it would work with resource consents and notices of requirement, and to a lesser extent plan changes, given many will not be relevant to climate resilience. Also some are covered by other methods, e.g. through the Building Act, through pre-development stormwater requirements, Wellington Water methods for efficient water use and discharge	Amend (a) by deleting the targets: maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, <del>including working towards a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050;</del>		Accept in part
<b>S140.065</b>	Wellington City Council (WCC)	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Wellington City supports increasing tree canopy cover in our City. Our urban suburbs collectively already have 30.61% tree cover. ( <a href="https://ir.canterbury.ac.nz/bitstream/handle/10092/102168/FORE126_Tree_Canopy_Wgtn_Report.pdf?sequence=2&amp;isAllowed=y#:~:text=Overall%20tree%20canopy%20cover%20in,ranging%20between%2010%20%E2%80%93%2040%25.">https://ir.canterbury.ac.nz/bitstream/handle/10092/102168/FORE126_Tree_Canopy_Wgtn_Report.pdf?sequence=2&amp;isAllowed=y#:~:text=Overall%20tree%20canopy%20cover%20in,ranging%20between%2010%20%E2%80%93%2040%25.</a> )  Our Green Network Plan aims to double the number of trees in the Central City. However, a 30% tree canopy cover target is not reasonable for some suburbs. Rongotai suburb is mostly Airport and bulk retail/industrial (currently 1% tree cover), and Pipitea suburb is mostly transport infrastructure (currently 3% tree cover). Wellington City is also relatively unique in the Region for not suffering from a noticeable heat island effect due to its regular wind, topography and coastal location. Targets are best left to district councils to set according to their own situation and methods.  <a href="https://ir.canterbury.ac.nz/bitstream/handle/10092/102168/FORE126_Tree_Canopy_Wgtn_Report.pdf?sequence=2&amp;isAllowed=y#:~:text=Overall%20tree%20canopy%20cover%20in,ranging%20between%2010%20%E2%80%93%2040%25.">E1265_Tree_Canopy_Wgtn_Report.pdf?sequence=2&amp;isAllowed=y#:~:text=Overall%20tree%20canopy%20cover%20in,ranging%20between%2010%20%E2%80%93%2040%25.</a> )  Our Green Network Plan aims to double the number of trees in the Central City. However, a 30% tree canopy cover target is not reasonable for some suburbs. Rongotai suburb is mostly Airport and bulk retail/industrial (currently 1% tree cover), and Pipitea suburb is mostly transport infrastructure (currently 3% tree cover). Wellington City is also relatively unique in the Region for not suffering from a noticeable heat island effect due to its regular wind, topography and coastal location. Targets are best left to district councils to set according to their own situation and methods.	Amend (a) by deleting the targets: maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, <del>including working towards a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050;</del>		Accept in part

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S144.022	Sustainable Wairarapa Inc	Policy CC.14: Climate-resilient urban areas - consideration	Support	The target of 10 percent tree canopy cover at a suburb-scale is useful. Encourage indigenous cover. Also, ensure decisions are made within & by communities.	Retain as notified.		Accept in part
S147.066	Wellington Fish and Game Council	Policy CC.14: Climate-resilient urban areas - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.		Accept in part
FS19.130	Wellington Water Ltd ("Wellington Water")	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS.  Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.  Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.  Some of the amendments undermine the more detailed content of PC1.	Disallow		Reject
FS30.235	Beef + Lamb New Zealand Ltd	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	That the submission be disallowed with the exception of 147.007	Reject
S148.029	Wellington International Airport Ltd (WIAL)	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Concerned that the drafting of this policy would require all of these matters to be achieved when considering development within urban areas by the use of the "and" between "e" and "f". In some urban environments achieving all of these outcomes would be impractical, for example buildings within the airport could be used more efficiently to conserve water and energy usage, however it would be inappropriate for the airport to create green spaces, as these would present an aviation hazard and safety issue	Delete this policy, or ensure that it does not apply to the Airport area.		Reject
FS7.016	Royal Forest and	Policy CC.14:	Oppose	It is not appropriate for the airport and aviation industry to be exempt from these policies.	Disallow		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
	Bird Protection Society (Forest & Bird)	Climate-resilient urban areas - consideration					
<b>FS8.019</b>	Guardians of the Bays Inc	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	Policy CC.14: Climate resilient urban areas needs to include Wellington Airport. Other airports in New Zealand e.g. Auckland airport clearly create green spaces around the airport which are not an aviation hazard. In fact stormwater ponds at Auckland Airport are used to lead birds away from the runway.	Disallow		Accept
<b>S166.053</b>	Masterton District Council	Policy CC.14: Climate-resilient urban areas - consideration	Not Stated / Neutral	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?	Clarifications.  More clarity needed around the tree canopy cover target.		Accept in part
<b>S165.0145</b>	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Increase targets for tree canopy cover and include provision for green infrastructure and making "room for rivers" in order to increase flood protection capacity and promote the carbon.	Amend clause (a) as follows:  (a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards achieving a target of:  i. 40 <b>at least 15</b> percent tree canopy cover at a suburb-scale by 2030,ii. <b>at least 30 percent cover by 2030 at the suburb scale where 15 percent cover is already in place</b> , and <del>30</del> iii. 50 percent cover <b>in all cases</b> by 2050, Include the following clause:(x) <b>providing for green infrastructure and making room for rivers</b>		Accept in part
<b>FS30.319</b>	Beef + Lamb New Zealand Ltd	Policy CC.14: Climate-resilient urban areas -	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially	Disallow		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		consideration		impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.			
<b>S167.0103</b>	Taranaki Whānui	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	[Note. no reason given in this submission point]	Insert a new clause, to read: <b>(x) enabling mana whenua / tangata whenua to provide for their relationship with their culture, land, water, wāhi tapu and other taonga</b>		Accept in part
<b>FS6.037</b>	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Policy CC.14: Climate-resilient urban areas - consideration	Support	We support this submission because this will enable better partnership in relation to climate resilient urban areas. This will also mean that mana whenua/ tangata whenua aspirations are upheld.	Allow		Accept in part
<b>S168.0130</b>	Rangitāne O Wairarapa Inc	Policy CC.14: Climate-resilient urban areas - consideration	Support	Rangitāne o Wairarapa support providing for actions and initiatives, particularly nature-based solutions to protect, enhance, or restore natural ecosystems.	Retain as notified.		Accept in part
<b>FS31.058</b>	Sustainable Wairarapa inc	Policy CC.14: Climate-resilient urban areas - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the	Not stated		Accept in part

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				widespread support for the original document. Thanks for an opportunity to make a further submission.  Nga mihi nui lan Gun			
<b>S168.0171</b>	Rangitāne O Wairarapa Inc	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	The requirements to provide for actions and initiatives, particularly nature-based solutions, that contribute to climate-resilient urban areas is supported. Nature-based solutions should be informed by mātauranga Māori.  However, Rangitāne o Wairarapa notes that the target and date for restoring tree canopy cover has been weakened from previous draft provisions, from 30% by 2030 to 10% by 2030 and 30% by 2050.	Amend the policy to reference that the use of nature-based solutions should be informed by mātauranga Māori.		Accept in part
<b>FS31.101</b>	Sustainable Wairarapa inc	Policy CC.14: Climate-resilient urban areas - consideration	Support	Kia ora koutou, My name is lan Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.  Nga mihi nui lan Gun	Not stated		Accept in part
<b>S131.0107</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.15: Improve rural resilience to climate change – non-regulatory	Support	In principle Ātiawa supports the intent of this policy.	Retain as notified.		Accept in part
<b>S11.021</b>	Outdoor Bliss Heather Blissett	Policy CC.18: Increasing regional forest cover to support	Support in part	Need a better more definitive word than preference	Amend Policy CC.18 as such:  "... regeneration of permanent indigenous forest <b>instead of</b> in-preference to exotic species"		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		climate change mitigation: "right tree-right place" - non-regulatory					
<b>S25.045</b>	Carterton District Council	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	<p>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 the region.</p> <p>CDC requests that this policy is more explicit in its preference for permanent, rather than plantation, forestry.</p>	Amend the policy so that it applies to permanent forest.		Accept
<b>S123.008</b>	Peter Thompson	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	Strongly advocate for using the appropriate species for the forest cover	Retain as notified.		Accept in part
<b>S133.051</b>	Muaūpoko Tribal Authority	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" -	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	<p>Retain as notified. OR</p> <p>Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tarais recognised.</p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		non-regulatory					
<b>FS6.069</b>	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	We oppose this submission because as Muaūpoko claims are inappropriate. This not only causes confusion around which iwi are Tangata Whenua in Te Whanganui a Tara rohe and which iwi to engage with, but also portrays a false perception of who the mana whenua are, which is also inappropriate.	Disallow	We seek that this part of the submission is disallowed.	Reject
<b>FS20.398</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.	Disallow	Disallow the whole submission	Reject
<b>S137.060</b>	Greater Wellington Regional	Policy CC.18: Increasing	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	Review and, where necessary, amend the wording of these provisions		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
	Council (GWRC)	regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory		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.	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.		
<b>FS30.033</b>	Beef + Lamb New Zealand Ltd	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	B+LNZ supports the intent of GWRC's submission to clarify that the objectives and policies 'are not intended to support unfettered afforestation across the region with the sole purpose of providing a carbon sink'. However, B+LNZ maintains significant concern with the drafting of these provisions and seek that they are withdrawn and redrafted when national legislation is completed. B+LNZ considers GWRC's submission points to highlight the need for well thought out provisions relating to climate change based on science and an understanding of the implications for productive land use and the rural community.	Allow in part		Accept in part
<b>S140.085</b>	Wellington City Council (WCC)	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	Support as proposed.	Retain as notified.		Accept in part
<b>S144.013</b>	Sustainable Wairarapa Inc	Policy CC.18: Increasing regional forest cover to support climate change	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.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		mitigation: "right tree-right place" - non-regulatory					
<b>S147.078</b>	Wellington Fish and Game Council	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.		Accept in part
<b>FS19.142</b>	Wellington Water Ltd ("Wellington Water")	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow		Reject
<b>FS30.247</b>	Beef + Lamb New Zealand Ltd	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	That the submission be disallowed with the exception of 147.007	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S163.082	Wairarapa Federated Farmers	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.		Reject
FS7.125	Royal Forest and Bird Protection Society (Forest & Bird)	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept in part
FS20.247	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
FS29.098	Ngā Hapu o Otaki	Policy CC.18: Increasing regional forest cover to	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners.	Not stated		Accept

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		support climate change mitigation: "right tree-right place" - non-regulatory		<p>It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>			
<b>FS30.154</b>	Beef + Lamb New Zealand Ltd	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
<b>S165.085</b>	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	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.		Accept in part
<b>FS30.319</b>	Beef + Lamb New Zealand Ltd	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national	Disallow		Reject

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		right place" - non-regulatory		legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.			
<b>S166.055</b>	Masterton District Council	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.		Accept in part
<b>S131.0110</b>	Ātiawa ki Whakaron gotai Charitable Trust	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.		Accept in part
<b>FS29.226</b>	Ngā Hapu o Otaki	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.  There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.  This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.  3.4 Freshwater including Public Access – Support in Principal	Not stated		Accept in part

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				<p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>			
S167.0128	Taranaki Whānui	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	<p>Given historical land confiscations and development barriers - there needs to be a specific protection in place to prevent further disadvantage to mana whenua.</p> <p>Future planning in partnership with mana whenua will provide greater confidence that the of implementation through regional plans.</p> <p>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.</p>	Retain as notified.		Accept in part
S168.0134	Rangitāne O Wairarapa Inc	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	<p>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.</p>	<p>Amend policy to read:</p> <p>"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, <b>cultural</b>, and economic well-being of local communities. ...."</p>		Accept in part
FS14.014	Masterton District Council	Policy CC.18: Increasing regional forest	Support		Not stated	Agrees with addition of "cultural" as an amendment to this policy.	Accept in part

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		cover to support climate change mitigation: "right tree-right place" - non-regulatory					
<b>FS31.062</b>	Sustainable Wairarapa inc	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui Ian Gun</p>	Not stated		Accept in part
<b>S30.082</b>	Porirua City Council	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.		Reject
<b>S115.084</b>	Hutt City Council	Policy CC.18: Increasing	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		Reject

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		regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory			apply to city and district councils.		
S16.017	Kāpiti Coast District Council	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	This policy is unnecessary as it merely summarises other policies proposed by RPS Change 1. It also links with Policy CC.14 which we strongly oppose and seek its deletion in our submission below	Delete Policy CC.4.		Reject
FS20.044	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	Ātiawa oppose the rationale set out by Kāpiti Coast District Council. Ātiawa refer to s31 of the RMA which clearly sets out the roles and responsibilities of territorial authorities, while s7(i) of the Act sets out that particular regard shall be given to the impacts of climate change. Additionally, the NPS-UD also direct decision-makers to have particular regard to the likely current and future effects of climate change. These pieces of legislation explicitly define the role of territorial authorities to have particular regard to the impacts of climate change when considering land use and development (including subdivision). It is disappointing to that Kāpiti Coast District Council have taking this position, local authorities must consider and plan for climate change as a matter of law and to protection current and future generations.	Disallow		Accept
S25.017	Carterton District Council	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part		<p><b>[Note: below is a C+P of submitters amendments, this does not align with their reasoning which sought the replacement of 'urban environments' with 'urban areas']</b></p> <p>Amend as follows:</p> <p><b>Policy CC.4: Climate resilient urban areas – district and regional plans</b></p> <p><i>District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban</i></p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					<p><i>areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.</i></p> <p><i>Explanation</i></p> <p><i>Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. For the purposes of this policy, climate-resilient urban areas mean urban environments that have the ability to withstand:</i></p> <ul style="list-style-type: none"> <li><i>• Increased temperatures and urban heat island</i></li> <li><i>• Increased intensity of rainfall and urban flooding</i></li> <li><i>• Droughts and urban water scarcity and security</i></li> <li><i>• Increased intensity of wind, cold spells, landslides, fire, and air pollution</i></li> </ul> <p><i>The policy is directly associated with Policy CC.14 which provides further direction on actions and initiatives to provide for climate resilient urban areas. It is noted that other policies of this RPS also provide for actions and initiatives to deliver climate resilient urban areas, including</i></p> <p><i>Policy FW.3.</i></p>		
<b>S30.028</b>	Porirua City Council	Policy CC.4: Climate resilient	Oppose	<p>The policy is implemented by another policy it refers to. It needs to be clearer to the exact actions to be undertaken.</p> <p>The policy relies on an understanding of what a climate-resilient* urban</p>	<p>Delete policy. OR</p> <p>Alternatively, amend policy so that it provides clear and</p>		Accept in part

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		urban areas - district and regional plans		<p>area is (which is not currently identified in the RPS) and has the effect of elevating Policy CC.14 from a "consider" policy to a "shall" policy without the necessary level of justification.</p> <p>While the explanation to the policy sets out what is intended by a climate-resilient urban area, this description is unclear and lacks the necessary certainty for regulatory controls in RMA plans. For example, it is unclear what is meant by "withstand" as used in this context, it is also unclear how is this to be measured and how will we know when we have created urban environments that can withstand the conditions listed in the explanation. It also assumes that all tools and levers are in RMA plans and fails to identify the role of other tools which lie outside of the control of RMA plans, such as:</p> <ul style="list-style-type: none"> <li>• the Building Code;</li> <li>• three water policies under the new Three Water entities; and</li> <li>• management of public spaces such as transport corridors, parks and reserves, and the DOC estate.</li> </ul> <p>The policy should be drafted in way that recognises that RMA plans can contribute to achieving climate-resilient urban areas, but they alone cannot achieve them.</p> <p>*Resilient is used 55 times in Proposed Change 1 document and resilience is used 51 times. No definition is provided for these terms. It is important that terms intended to directly determine regulatory frameworks in regional plans and district plans are rigorously developed and understood, and properly explained and/or provided with a definition in the RPS.</p>	<p>appropriate direction to plan users in line with objectives.</p> <p>Define 'resilient' and 'climate-resilient'.</p>		
<b>FS25.061</b>	Peka Peka Farm Limited	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	<p>The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.</p>	Allow		Accept in part
<b>S34.009</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose in part	<p>Council supports the intent to enable climate resilient urban areas, however, it is considered inappropriate for RPS to direct many of the measures identified to achieve this in Policy CC.14.</p> <p>It is unclear what is meant by "the ability to withstand" the factors identified. This is not consistent with terminology in the RMA and the policy ignores the fact that provisions in district plans alone cannot achieve this policy. There is no evidence to support what level of intensity of these hazards should be provided for nor recognition that other methods such as the three waters reform and the Building Act are relevant to the ability to achieve this policy.</p> <p>The policy fails to acknowledge that the desire to create climate resilience urban areas, will inevitably require the support of hard infrastructure alongside nature-based solutions.</p>	<p>Delete the policy, or amend policy to read:</p> <p>"District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas." <del>by including provisions to address: providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban</del></p>		Reject

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				<p>The explanation for Policy CC.4 also appears to provide direction / identifies factors that need to be addressed that more appropriately sit within a policy, rather than the reasoning for the policy. As explanatory text Council is concerned that this would not have been through a sufficient Section 32 assessment.</p> <p>It is also considered problematic to cross reference both specifically and generally to another provision that is relevant in interpreting another policy.</p> <p>The relief sought by Council is more consistent with the issues identified in the RPSPC1, provides territorial authorities flexibility to address specific issues in their areas.</p> <p>The relief sought by Council also allows recognition that there are limits to the practicality in urban areas of measures to address drought and urban water scarcity, such as off grid water sources.</p>	<p>environments.</p> <ul style="list-style-type: none"> <li>•the effects of increasing temperatures; and urban heat island;</li> <li>•increasing intensity of rainfall and urban flooding;</li> <li>•Droughts and urban water scarcity and security;</li> <li>•Increased intensity of wind, cold spells, landslides, fire, and air pollution</li> <li>•natural hazards; and</li> <li>•water security</li> </ul> <p>by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments."</p> <p>Explanation</p> <p>Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. For the purposes of this policy, climate-resilient urban areas mean urban environments that have the ability to withstand:</p> <ul style="list-style-type: none"> <li>• Increased temperatures and urban heat island</li> <li>• Increased intensity of rainfall and urban flooding</li> <li>• Droughts and urban water scarcity and security</li> <li>• Increased intensity of wind,</li> </ul>		

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					cold spells, landslides, fire, and air pollution		
S63.014	Mary Beth Taylor	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Municipal swimming pools must have storm water collection and storage facility, in ground, under car parks to be used to fill the pool or as emergency water supply. Municipal swimming pools must also have roof top solar energy generation and/or solar hot water heating to reduce the high energy use for heating the water.	Amend policy to require municipal swimming pools to have storm water collection and storage facilities (in ground), and under car parks and rooftop solar energy generation and/or solar hot water heating.		Accept in part
S78.007	Beef + Lamb New Zealand Limited	Policy CC.4: Climate resilient urban areas - district and regional plans	Not Stated / Neutral	Accepts that Policy CC.4 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified		Accept in part
FS20.315	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	Ātiawa oppose the entire submission by Beef + Lamb New Zealand Limited. The relief sought by Beef + Lamb is to withdraw all proposed amendments, apart from those which give effect to NPS-UD. The basis for deleting the proposed amendments (apart from NPS-UD provisions) is to delay decision-making until further national direction is gazetted or until the scheduled full review of the RPS. Ātiawa do not accept that delaying proposed RPS Change 1 is an appropriate course of action, further delays would permit further degradation of te taiao and continue to have perverse outcomes for mana whenua.	Disallow	Disallow the relief sought where the submitter seeks the deletion of proposed amendments.	Accept in part
S79.021	South Wairarapa District Council	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose in part	<p>Submission relates to Policy CC.4.</p> <p>The purpose of the policy is unclear. The policy refers to matters that are included for a Freshwater Planning Process, but is not of itself considered part of it. This is confusing and will complicate the hearing process. It is arguable that parts of CC.14 do not either directly or indirectly relate to freshwater matters contained in the NSP FM and therefore should be open to the standard schedule 1 process.</p> <p>While noting TA's functions in s.31 (b)(i), construction standards of buildings is a matter appropriately and adequately managed by the Building Act.</p>	<p>Amend Policy CC4 so that matters in CC.14(a) and (d) are directly referenced in the policy so that they need not be repeated in CC.14 and are within the scope of a schedule 1 hearing process.</p> <p>District and regional plans shall include policies, rules and/or non-regulatory methods to provide for climate- resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments <b>including:</b></p> <p><b>(a) maintaining,</b></p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					<p>enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050,</p> <p>(b) the application of water sensitive urban design principles to integrate natural water systems into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality</p> <p>(c) protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural hazards and the effects of climate change</p> <p>[End of amendments to Policy CC.4]</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought.</p>		
<p><b>FS14.023</b></p>	<p>Masterton District Council</p>	<p>Policy CC.4: Climate resilient urban areas - district and regional plans</p>	<p>Support in part</p>	<p>Agree with:</p> <p>Submission relates to Policy CC.4. The purpose of the policy is unclear. The policy refers to matters that are included for a Freshwater Planning Process, but is not of itself considered part of it. This is confusing and will complicate the hearing process. It is arguable that parts of CC.14 do not either directly or indirectly relate to freshwater matters contained in the NSP FM and therefore should be open to the standard schedule 1 process.</p> <p>While noting TA's functions in s.31 (b)(i), construction standards of</p>	<p>Not stated</p>	<p>Agree with relief sought: Amend Policy CC4 so that matters in CC.14(a) and (d) are directly referenced in the policy so that they need not be repeated in CC.14 and are within the scope of a schedule 1 hearing process.</p>	<p>Accept in part</p>

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				buildings is a matter appropriately and adequately managed by the Building Act.		District and regional plans shall include policies, rules and/or non-regulatory methods to provide for climate- resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments including:(a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050,(b) the application of water sensitive urban design principles to integrate natural water systems into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality(c) protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural	

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
						hazards and the effects of climate change [End of amendments to Policy CC.4] Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	
S95.014	Tony Chad	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Municipal swimming pools must have storm water collection and storage facility, in ground, under car parks to be used to fill the pool or as emergency water supply.	Amend policy to require storm water collection and storage facilities (in ground), and under car parks to be used to fill municipal swimming pools or as emergency water supply.		Accept in part
S102.015	Te Tumu Paeroa   Office of the Māori Trustee	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.		Accept in part
S113.013	Wellington Water	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	The drafting is convoluted and should be simplified.	Amend the Policy as follows:  District and regional plans shall include policies, rules and/or methods to <del>provide</del> for <b>achieve</b> climate-resilient urban areas by <b>enabling and promoting/encouraging the</b> <del>providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.</del>		Accept in part
S115.030	Hutt City Council	Policy CC.4: Climate resilient urban areas -	Oppose	This policy is not sufficiently clear for policy statement users to understand what is required.	Delete Policy CC.4.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		district and regional plans					
<b>FS12.007</b>	Kāinga Ora - Homes and Communities	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Kāinga Ora agrees that Policy CC.4 as proposed is uncertain and unclear in how it would be implemented	Allow		Accept in part
<b>S118.006</b>	Peka Peka Farm Limited	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Supports the matters listed in Policy CC.14, linking those to a well-functioning urban environment broadens that existing definition as set out in Policy 1 of the NPS-UD, however seeks that this linkage be removed from the policy.	Amend Policy CC.4 as follows:  "Policy CC.4 Climate resilient urban areas - district and regional plans (FPP) District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments."		Accept in part
<b>S119.002</b>	Summerset Group Holdings Limited	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Policy CC.14 lists a range of actions that will contribute to climate resilient urban areas. Linking those to a well-functioning urban environment broadens that existing definition as set out in Policy 1 of the NPS-UD and is not required.	Amend Policy CC.4 as follows:  "Policy CC.4 Climate resilient urban areas - district and regional plans (FPP) District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments."		Accept in part
<b>S120.002</b>	The Retirement Villages Association	Policy CC.4: Climate resilient urban	Support in part	Policy CC.14 lists a range of actions that will contribute to climate resilient urban areas. Linking those to a well-functioning urban environment broadens that existing definition as set out in Policy 1 of the NPS-UD and is not required.	Amend Policy CC.4 as follows:  "Policy CC.4 Climate resilient urban areas - district		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
	n of New Zealand	areas - district and regional plans			and regional plans (FPP) District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments."		
<b>S131.050</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided. We also support a proactive approach to responding to climate change including managed retreat and increased restrictions on development in high prone flood areas. In line with this, we also support the identification of future new town centres that are removed from flood and liquefaction risk.	Retain as notified.		Accept in part
<b>FS20.384</b>	Ātiawa ki Whakaron gotai Charitable Trust		Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā	Disallow	Disallow the whole submission	Reject

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				and mana whenua on the land, as we have undisturbed for over 198 years.			
<b>FS29.320</b>	Ngā Hapu o Otaki	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environemental resilience and the cultural agility our shared whakapapa offers.</p>	Not stated		Accept in part
<b>S132.005</b>	Toka Tu Ake EQC	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	It is important that district councils effectively manage natural hazard risks and the effects of climate change in implementing the recent NPS-UD. As such it would be helpful for the RPS to include guidance on how to implement climate and natural hazard resilience in urban areas.	Strengthen, especially regards areas intensified through the NPS-UD. As "climate resilient urban areas" is defined as urban environments which have the ability to withstand the impacts of increased natural hazards due to the impact of climate change, this should be explicitly worded in the policy.		Accept
<b>S133.037</b>	Muaūpoko Tribal Authority	Policy CC.4: Climate resilient	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		Accept

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		urban areas - district and regional plans			ensure Muaūpoko's connection to Te-Whanganui-a-Tarais recognised.		
<b>FS6.065</b>	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira		Oppose	We oppose this submission because as Muaūpoko claims are inappropriate. This not only causes confusion around which iwi are Tangata Whenua in Te Whanganui a Tara rohe and which iwi to engage with, but also portrays a false perception of who the mana whenua are, which is also inappropriate.	Disallow	We seek that this part of the submission is disallowed.	Reject
<b>S135.005</b>	Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/Stebbings Farmlands Ltd	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	Not convinced that this very high level policy and the outcomes described in the explanation will be able to be implemented at a local level i.e. through subdivisions. The requirement for TA's to have objectives/policies and rules is a very broad 'catch-all' wish-list for which no amount of conditions on a subdivision could achieve. It's simply not practical or achievable and whilst it is a noble attempt to solve the climate crisis, there is only some much resource and ability for TA's to implement and achieve the outcomes sought by this policy.	Delete Policy CC.4		Reject
<b>S137.030</b>	Greater Wellington Regional Council (GWRC)	Policy CC.4: Climate resilient urban areas - district and regional plans	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 <b>Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.</b>		Accept in part
<b>FS13.013</b>	Wellington City Council	Policy CC.4: Climate resilient urban areas - district and regional plans	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow		Accept in part
<b>S140.032</b>	Wellington City Council (WCC)	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	At a high level WCC supports the intent of this policy. This policy is not sufficiently clear for policy statement users to understand what is required. Policy direction is unclear as to what the RPS is intending, particularly as resilience in relation to climate change is not defined in the RPS. The Explanation reads as policy direction rather than a requirement to provide additional information and should be included in the main section of the policy.	Amend to clarify and refine policy  Amend Policy to include a portion of the explanation in the  Policy section.  District and regional plans shall include policies, rules		Accept in part

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					<p>and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.</p> <p><del>Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas.</del> For the purposes of this policy, climate-resilient urban areas mean urban environments that have the ability to withstand:</p> <ul style="list-style-type: none"> <li>• Increased temperatures and urban heat island</li> <li>• Increased intensity of rainfall and urban flooding</li> <li>• Droughts and urban water scarcity and security</li> <li>• Increased intensity of wind, cold spells, landslides, fire, and air pollution</li> </ul> <p>Explanation</p> <p><b>The policy is directly associated with Policy CC.14 which provides further direction on actions and initiatives to provide for climate resilient urban areas. It is noted that other policies of this RPS also provide for actions and initiatives to deliver climate resilient urban areas, including Policy FW.3</b></p>		

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FS14.038	Masterton District Council	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	<p>Agree with WCC that:</p> <ul style="list-style-type: none"> <li>This policy is not sufficiently clear for policy statement users to understand what is required.</li> <li>Policy direction is unclear as to what the RPS is intending, particularly as resilience in relation to climate change is not defined in the RPS.</li> <li>The Explanation reads as policy direction rather than a requirement to provide additional information and should be included in the main section of the policy.</li> </ul>	Not stated	Agree with WCC re: <ul style="list-style-type: none"> <li>Amend to clarify and refine policy</li> <li>Amend Policy to include a portion of the explanation in the Policy section.</li> </ul>	Accept in part
S144.029	Sustainable Wairarapa Inc	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	See Policy 57. Especially Method UD1: incorporate climate resilience into development manuals and urban design guides.	Retain as notified.		Accept in part
S147.049	Wellington Fish and Game Council	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified.		Accept in part
FS19.113	Wellington Water Ltd ("Wellington Water")	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow		Reject
FS30.218	Beef + Lamb New Zealand Ltd	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating	Disallow	That the submission be disallowed with the exception of 147.007	Reject

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				to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.			
<b>S158.015</b>	Kāinga Ora Homes and Communities	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Considers that this policy can be combined with Policy CC.14 rather than referring to Policy CC.14 within the policy itself.	Amend and combine Policy CC.4 with Policy CC.14.		Accept in part
<b>S165.037</b>	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	This initiative is appropriate.	Retain.		Accept in part
<b>FS30.319</b>	Beef + Lamb New Zealand Ltd	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
<b>S166.044</b>	Masterton District Council	Policy CC.4: Climate resilient urban areas - district and regional plans	Not Stated / Neutral	Policy CC.4 is difficult to implement as a Tier 3 authority.  There needs to be equity across the region in this approach.	Clarifications.  Need clarification between Tier 1 and Tier 3 obligations		Accept in part
<b>S167.064</b>	Taranaki Whānui	Policy CC.4: Climate resilient urban areas -	Support in part	Taranaki Whānui supports the principle of new Policy CC.4 but suggests specific cross reference to Policy CC.17 to ensure alignment with mana whenua values.	Retain as notified.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		district and regional plans					
<b>S11.014</b>	Outdoor Bliss Heather Blissett	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	Add plural. Trees are social.	Amend explanation of Policy CC.6 as follows:  "...The policy directs regional plans to develop provisions that will support "right trees-right place", seeking..."		Accept in part
<b>S16.019</b>	Kāpiti Coast District Council	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	We support the intent of the policy but request it is carefully checked to ensure it does not unnecessarily duplicate NPS-PF requirements. We request the implementation of this policy remains the responsibility of GWRC only.	Retain		Accept in part
<b>S25.019</b>	Carterton District Council	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	<p>CDC supports this policy, and particularly that it requires the avoidance of plantation forestry on highly erodible land.</p> <p>CDC does have concerns that the Wairarapa will be expected to provide a greater proportion of permanent forest cover than other areas because it has larger areas of rural land. When the driver for increased afforestation is achieving net zero carbon emissions, it appears inequitable that the Wairarapa might suffer from greater afforestation when there is a lack of emission reduction in other areas. CDC seeks that the policy reflect that offset should occur in the area where emissions are generated.</p> <p>While permanent forest, and particularly indigenous permanent forest, has significant benefits, it is not productive and therefore the Wairarapa may bear an unreasonable burden from this policy. CDC requests that the policy is amended to reflect that permanent forest should not be planted on productive land.</p>	Amend the policy so that permanent forest is not encouraged on highly productive land.  Provide a more supportive policy framework for this when a variation is prepared to respond to the NPS-HPL.		Accept in part
<b>FS14.004</b>	Masterton District Council	Policy CC.6: Increasing regional	Support		Not stated	Agrees with CDC's decision requested to amend the policy so that permanent	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		forest cover and avoiding plantation forestry on highly erodible land - regional plans				forest is not encouraged on highly productive land, and to provide a more supportive policy framework for this when a variation is prepared to respond to the NPS-HPL.	
<b>S30.030</b>	Porirua City Council	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	<p>Council supports the intent of this policy. However, is unclear what 'support' means in this context, and 'enable' or 'require' may be more appropriate. For example, as the relevant objective seeks that there is an increase, the term 'supporting' may be insufficient. As raised with the corresponding objective, the amount of 'increase' needs to be articulated.</p> <p>The text requested to be deleted is not needed, as it is simply repeating the objective.</p> <p>While Council agrees with the intent to encourage indigenous forest restoration to allow greater biodiversity and soil reclamation, we note that this policy could potentially impact carbon farming where permanent exotic forests are used. Exotic forest has a greater storage of carbon, both in the short and long term. Council understands that there is some uncertainty in national policy with regard to whether permanent exotic forest should or should not get ETS credits.</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:  Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of permanent forest in the region to contribute to achieving net-zero greenhouse gas emissions by 2050, while:		Accept in part
<b>FS25.063</b>	Peka Peka Farm Limited	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part
<b>S31.017</b>	Robert Anker	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible	Not Stated / Neutral	<p>Offsetting through carbon sequestration is a viable, long-term solution. GWRC may seek to reduce emissions and might even, to some extent, succeed. The emphasis on permanent indigenous forest has little to do with whether it is the most effective course of action to sequester carbon but is greatly influenced by a philosophical mindset.</p> <p>Forest, comprised of any species, will only produce a net storage of carbon while it is in an active growing phase. Once the forest is mature it reaches a state of limbo where there is no longer a net absorption of carbon and as trees within the forest die and fall to the forest floor and rot, the forest becomes a net emitter of methane.</p>	GWRC review the calculations which have been used to support the concept that permanent forest gives the best overall outcome taking all factors into consideration.  GWRC to produce the scientific evidence for scrutiny and peer review.		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		land - regional plans					
<b>S34.042</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	<p>Support the measures to increase forest and that this is a regional function only, however, it is unclear how this will be balanced against housing need, and it does not appear that this is supported by the Emissions Trading Scheme Credit which may impact on willingness to adopt the practice.</p> <p>There is a need to ensure that regional council adequately resources incentives for landowners.</p>	Advocate for central government supporting indigenous forest cover in the Emissions Trading Scheme as the primary incentive for the implementation of this method.		Accept in part
<b>S62.017</b>	Philip Clegg	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose in part	<p>Questions the evidential basis for the assertions that indigenous forest is better at sequestering carbon than exotic forest, or that permanent forest is better at carbon sequestration than, say, sustainably farmed timber forests (which could be native or exotic species). Refer to submission for more detail on reasoning.</p>	<p>Revisit the assertion in the policy that permanent indigenous forest gives the best overall outcome taking all factors into consideration and produce the scientific evidence for scrutiny and peer review.</p>		Reject
<b>S79.023</b>	South Wairarapa District Council	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose in part	<p>A more fulsome assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where:</p> <ul style="list-style-type: none"> <li>a. Reductions required by this policy is in excess of government policy; and,</li> <li>b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and,</li> <li>c. Goes beyond the economic impact of carbon pricing; and,</li> <li>d. Considers the cost of the implied requirement to supplant farming activities with carbon sequestration.</li> </ul> <p>The proposed approach facilitates the complete afforestation of all rural business land in the district. There is insufficient analysis of costs and benefits, particularly in the long term to the region and the South Wairarapa District. This is evident by a lack on limitations proposed. Offsetting of greenhouse gas has limitations, particularly where no controls have been put in place at source.</p> <p>SWDC does have concerns that the Wairarapa will be expected to provide a greater proportion of permanent forest cover than other areas because it</p>	<p>Either delete Policy CC.6, or Amend Policy CC.6 as follows:</p> <p>Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of permanent forest in the region to contribute to achieving net-greenhouse gas emissions by 2050, while:</p> <p>(a) promoting and incentivising the planting or regeneration of permanent indigenous forest over exotic species, particularly on highly erodible land and in</p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				<p>has larger areas of rural land. When the driver for increased afforestation is achieving net zero carbon emissions, it appears inequitable that the Wairarapa might suffer from greater afforestation when there is a lack of emission reduction in other areas.</p>	<p>catchments where water quality targets for sediment are not reached, and</p> <p>(b) avoiding plantation forestry on highly erodible land, particularly in catchments where water quality targets for sediment are not reached and</p> <p><b>(c) not enabling afforestation of permeant forest for the purposed of offsetting emissions from outside of the environment they are located</b></p> <p><b>(d) ensuring that any offsets are proportionate and only considered after avoidance or reductions at source have been maximised.</b></p> <p>[End of amendments to Policy CC.6]</p> <p>Or, similar relief to the same effect; AND;</p>		
<b>S96.013</b>	Sarah (Dr) Kerkin	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose in part	<p>Questions the evidential basis for the assertions that indigenous forest is better at sequestering carbon than exotic forest, or that permanent forest is better at carbon sequestration than, say, sustainably farmed timber forests (which could be native or exotic species). Refer to submission for more detail on reasoning.</p>	<p>Revisit the assertion in the policy that permanent indigenous forest gives the best overall outcome taking all factors into consideration and produce the scientific evidence for scrutiny and peer review.</p>		Reject
<b>S102.017</b>	Te Tumu Paeroa   Office of the Māori Trustee	Policy CC.6: Increasing regional forest cover and avoiding	Support	<p>Generally supports the regulatory policies in the 'Climate Change' chapter.</p>	<p>Retain as notified.</p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		plantation forestry on highly erodible land - regional plans					
<b>S123.004</b>	Peter Thompson	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Allowing regeneration or planting of indigenous forest on highly erodible land will provide multiple benefits.	Retain as notified.		Accept in part
<b>S131.052</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	Ātiawa supports the overall intent of Policy CC.6 to increase permanent forest cover to reduce greenhouse gas emissions, promoting and incentivising indigenous forest cover and avoiding plantation forestry on highly erodible land. The Trust is concerned that this policy could affect whānau, hapū, and iwi that have an interest in plantation forestry.	Ātiawa seeks that further engagement occurs with Māori who have land that could be affected by Policy CC.6.		Accept in part
<b>FS29.322</b>	Ngā Hapu o Otaki	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p>	Not stated		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
				<p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers..</p>			
<b>S133.039</b>	Muaūpoko Tribal Authority	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	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.		Accept in part
<b>FS6.067</b>	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	We oppose this submission because as Muaūpoko claims are inappropriate. This not only causes confusion around which iwi are Tangata Whenua in Te Whanganui a Tara rohe and which iwi to engage with, but also portrays a false perception of who the mana whenua are, which is also inappropriate.	Disallow	We seek that this part of the submission is disallowed.	Reject
<b>FS20.386</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.6: Increasing regional forest cover and	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in	Disallow	Disallow the whole submission	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		avoiding plantation forestry on highly erodible land - regional plans		support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.			
<b>S137.059</b>	Greater Wellington Regional Council (GWRC)	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	<p>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.</p> <p>Amendments are required to make the intent clear.</p>	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.		Accept
<b>FS30.032</b>	Beef + Lamb New Zealand Ltd	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land -	Support in part	<p>B+LNZ supports the intent of GWRC's submission to clarify that the objectives and policies 'are not intended to support unfettered afforestation across the region with the sole purpose of providing a carbon sink'. However, B+LNZ maintains significant concern with the drafting of these provisions and seek that they are withdrawn and redrafted when national legislation is completed. B+LNZ considers GWRC's submission points to highlight the need for well thought out provisions relating to climate change based on science and an understanding of the implications for productive land use and the rural community.</p>	Allow in part		Accept in part

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		regional plans					
<b>FS13.014</b>	Wellington City Council	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow		Accept
<b>S144.007</b>	Sustainable Wairarapa Inc	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Allowing regeneration or planting of indigenous forest on highly erodible land will provide multiple benefits. In the Wairarapa, sedimentation and temperature increases are having the biggest impact on stream health. Increasing indigenous forest cover will provide benefits to carbon sequestration, indigenous biodiversity and freshwater health	Retain as notified.		Accept in part
<b>S147.050</b>	Wellington Fish and Game Council	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified		Accept in part
<b>FS19.114</b>	Wellington Water Ltd ("Wellington Water")	Policy CC.6: Increasing regional forest cover and avoiding	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS.  Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.	Disallow		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		plantation forestry on highly erodible land - regional plans		Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.  Some of the amendments undermine the more detailed content of PC1.			
<b>FS30.219</b>	Beef + Lamb New Zealand Ltd	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	That the submission be disallowed with the exception of 147.007	Reject
<b>S163.047</b>	Wairarapa Federated Farmers	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	Defer to the full review of the RPS in 2024.  This policy is pre-empting policy development which is in process at the national level. Refer to submission for significant detail on the challenge of managing forestry.	That Policy CC.6 be deleted  Delete the FW icon.		Reject
<b>FS7.091</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept in part
<b>FS20.213</b>	Ātiawa ki Whakaron	Policy CC.6:	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire	Disallow	Disallow the entire submission by	Accept in part

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	gotai Charitable Trust	Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans		proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.		Wairarapa Federated Farmers.	
FS29.064	Ngā Hapu o Otaki	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated		Accept
FS30.120	Beef + Lamb New Zealand Ltd	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
S165.039	Royal Forest and Bird Protection Society of New Zealand Inc.	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on	Support in part	It is ecologically responsible to prioritise the planting or restoration of indigenous vegetation over exotic. However, a wording change is required to ensure the policy is strengthened, and that there is policy support for other indigenous vegetation to be captured.	Amend as follows:  Regional plans shall include objectives, policies, rules and/or methods that <del>support</del> <b>require</b> an increase in the area of permanent forest <b>and wetlands</b> in the region to contribute to achieving		Accept in part

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	(Forest & Bird)	highly erodible land - regional plans			net-zero greenhouse gas emissions by 2050, while:  (a) promoting and incentivising the planting or regeneration of permanent indigenous forest <del>forest</del> <b>vegetation</b> over exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached, and  Also amend the title to this policy to reflect the change sought.		
FS30.056	Beef + Lamb New Zealand Ltd	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	This policy relies on the actions of rural communities and will significantly affect rural people, land, and businesses. It is inappropriate to include such policies without the necessary engagement with the rural community and ahead of the implementation of national legislation relating to climate change. Furthermore, Plan Change One does not differentiate between short and long-lived gases and is therefore inconsistent with the fundamental concept to New Zealand's approach to climate change.	Disallow		Reject
FS20.071	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	As in our original submission, Ātiawa support supports the overall intent of Policy CC.6 to increase permanent forest cover to reduce greenhouse gas emissions, promoting and incentivising indigenous forest cover and avoiding plantation forestry on highly erodible land. Ātiawa is concerned that this policy could affect whānau, hapū, and iwi that have an interest in plantation forestry.  In addition, Ātiawa support in part reference to 'vegetation' over 'forest', provided that it is the right species in the right place.	Allow		Accept in part
FS30.319	Beef + Lamb New Zealand Ltd	Policy CC.6: Increasing regional forest cover and	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially	Disallow		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		avoiding plantation forestry on highly erodible land - regional plans		impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.			
S166.046	Masterton District Council	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Not Stated / Neutral	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.	MDC strongly recommends that it is involved in the development of this plan as well as relevant sector and communities.		Accept in part
S167.066	Taranaki Whānui	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	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 whenua.  Future planning in partnership with mana whenua will provide greater confidence of the implementation through regional plans.	Insert a new clause (c) to read: <b>(c) resource and partner with mana whenua in the development of regional forest plans.</b>		Accept in part
S170.043	Te Rūnanga o Toa Rangatira	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Not Stated / Neutral	Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans  It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.  The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it	Clarify what is meant by 'nature-based solutions'.  Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.		Accept in part

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				<p>is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p> <p>It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.</p>			
<b>FS29.157</b>	Ngā Hapu o Otaki	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making – Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 – Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>	Not stated		Accept in part
<b>S168.0121</b>	Rangitāne O	Policy CC.6: Increasing	Support in part	<p>Rangitāne o Wairarapa support the promotion and incentivisation of the planting or regeneration of permanent indigenous forest over exotic species. However, we request that 'financial incentives' are included in the</p>	Include reference to financial incentives in the explanatory text to the policy, as one tool		Accept in part

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	Wairarapa Inc	regional forest cover and avoiding plantation forestry on highly erodible land - regional plans		explanatory text to highlight the influence such incentives can have in achieving regeneration of permanent indigenous forest.	amongst others, that will assist to achieve the "right tree-right place".		
<b>FS31.048</b>	Sustainable Wairarapa inc	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui Ian Gun</p>	Not stated		Accept in part
<b>S16.020</b>	Kāpiti Coast District Council	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and	Oppose	<p>Council considers the nature-based approach does not fall under sections 30 or 31 of the RMA as it goes beyond the maintenance of indigenous biodiversity. Council notes the closest relevant legislative or statutory planning document reference is Policy 26 that provides for natural defenses against coastal hazards. Policy CC.7 proposes to go far beyond this.</p> <p>More fundamentally, we are unaware of any evidence that a genuine resource management issue exists, or if it does, that a regulatory method would be the most appropriate method to address it when compared to other reasonably practicable methods available.</p> <p>As the proposed approach does not appear to be required by the Act or any higher level statutory planning document, it is particularly concerning to Council that the mandatory application of the policy is proposed and that the district plan would be required to give effect to it.</p>	Delete Policy CC.7 entirely and investigate potential non-regulatory methods.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		regional plans		Overall, we consider the suggested requirement for district plans to require objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, cannot be justified under section 32 of the RMA.			
<b>FS20.045</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Ātiawa are disappointed with the regressive approach taken by Kāpiti Coast District Council in regard to nature based solutions to climate change. It is evident that current approaches to managing the environment are inadequate, and that options such as nature-based solutions could provide better outcomes, culturally, socially and economically. While nothing in legislation specifically requires local authorities to consider nature-based solutions, the RMA (s7) and the NPS-UD (Objective 8, Policy 1, Policy 6) all require local authorities to have particular regard to the effects of climate change in resource management decision making and provide well-functioning urban environment that are resilient to the effects of climate change, which could include options such as nature-based solutions and mātauranga Māori.	Disallow		Accept in part
<b>S30.031</b>	Porirua City Council	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	<p>Council supports the intent of this policy, and has already attempted to enable 'soft- engineering measures' in our Proposed District Plan. This is defined clearly as follows:</p> <p>means a form of hazard mitigation that uses natural elements to provide protection to private properties, public space and infrastructure. It includes sacrificial fill, vegetation planting, beach nourishment and dune restoration.</p> <p>The definition of 'nature-based solution' relies on a common understanding of a number of terms used in that definition, such as "actions", "natural ecosystems", "natural elements", and "resilience", since those terms are not themselves defined.</p> <p>Further, a lack of clarity and regulatory certainty with this policy would likely lead to interpretation issues, and could require a regulatory framework that applies to all development regardless of scale and regardless of activity type. The s32 evaluation report does not identify why this level of regulatory reach is appropriate.</p> <p>It is difficult to reconcile the examples used in the definition with the creation of a regulatory framework that captures all development and infrastructure regardless of scale, as required by Policy CC.7.</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, including what is meant by "actions", "natural ecosystems", "natural elements", and "resilience".		Accept in part
<b>FS25.064</b>	Peka Peka Farm Limited	Policy CC.7: Protecting, restoring, and enhancing	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans					
<b>S34.043</b>	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	<p>Council is concerned that there is no legislative ability to direct district plans on the use of nature-based solutions under sections 30 and 31 of the RMA. There is also no understanding of the full maintenance costs associated with these solutions over long term.</p> <p>Council also notes that there are other solutions which can achieve positive outcomes, which do not necessarily have natural components, e.g., subsurface water attenuation.</p> <p>See our notes on Objective CC.4 for comments regarding clarity of the definition of nature-based solutions.</p>	<p>Delete or amend to make this policy a regional council function only.</p> <p><del>“District and R</del>egional plans shall include objectives, policies, rules and/or methods...”</p> <p>Allow district councils to define and provide guidance on what tools best work under this policy as a mean of compliance, through their own definition of nature-based solutions.</p> <p>Provide clarity on nature-based solutions vs. green infrastructure and apply consistent terms throughout the RPS.</p>		Reject
<b>S79.024</b>	South Wairarapa District Council	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change -	Support in part	The policy intent is supported, 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.	<p>Retain as notified</p> <p>Include a non-regulatory method to develop guidance material for the application of nature based solutions included in infrastructure and development.</p>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		district and regional plans					
S102.018	Te Tumu Paeroa   Office of the Māori Trustee	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.		Accept in part
S113.014	Wellington Water	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Nature-based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment	Amend the Policy as follows:  District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, <b>where practicable</b> .		Accept in part
FS13.015	Wellington City Council	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		provide nature-based solutions to climate change - district and regional plans					
<b>FS3.017</b>	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Waka Kotahi supports this submission point as nature-based solutions are not always viable and need to be considered where practicable	Allow		Accept in part
<b>S115.031</b>	Hutt City Council	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose in part	The definition of "nature-based solutions" is not sufficiently clear for policy statement users to understand what is required. It is also unlikely that a district or regional plan would fail to provide for nature-based solutions to be part of development and infrastructure planning and design in the absence of this direction.	Delete Policy CC.7		Accept in part
<b>FS10.017</b>	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z	Policy CC.7: Protecting, restoring,	Support	The Fuel Companies expressed concerns in their own submission around the Policy CC.7 requirements to deliver 'nature based solutions' and the need to enable continued use of existing traditional infrastructure types. Deletion of the policy in its entirety is supported.	Allow	Allow the submission and delete Policy CC.7 in its entirety.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
	Energy Ltd (the Fuel Companies)	and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans					
<b>FS24.013</b>	Powerco Limited	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Powerco expressed concern in its own submission around the Policy CC.7 requirements to deliver 'nature based solutions' and the need to enable continued use of existing traditional infrastructure types. Deletion of the policy in its entirety is supported.	Allow	Allow the submission and delete Policy CC.7 in its entirety.	Accept in part
<b>S123.005</b>	Peter Thompson	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and	Support	Nature-based solutions are key to dealing with the impacts of climate change.	Retain as notified.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		regional plans					
S127.008	Neo Leaf Global	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Regarding the explanation: At issue here is the presumption and lack of appreciation that nature-based solutions are not necessarily fit-for-purpose in all circumstances and may not offer pragmatic durable, safe or cost-effective solutions, and can not necessarily perform the roles and standards that infrastructure is required to meet.	Development and infrastructure planning and design should include <b>consideration of nature-based components</b> solutions as standard practice, including green infrastructure, green spaces, and environmentally friendly design elements to manage issues such as improving water quality and natural hazard protection. Nature-based <b>opportunities</b> solutions can contribute strongly to provision of <del>perform the roles of traditional</del> infrastructure <b>services</b> , while also building resilience to the impacts of climate change and providing benefits to indigenous biodiversity and community well-being."		Accept in part
S128.023	Horticulture New Zealand	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Supports nature-based solutions where possible, however it acknowledges that other interventions will likely also be required. Supports this policy (of providing for nature-based solutions) but suggests a minor amendment to reflect our interpretation of the policy so this is clear.	Add a sentence to the Explanation paragraph. <b>This policy does not preclude the use of other solutions, where necessary or appropriate.</b>		Accept in part
S129.016	Waka Kotahi NZ Transport Agency	Policy CC.7: Protecting, restoring, and enhancing	Support	Generally supports Policy CC.7 but consider that 'protecting' is too strong of a directive. The policy should be amended to be in keeping with the National Policy Statement for Indigenous Biodiversity drafting.	Amend Policy CC.7 as follows: <del>Protecting, restoring, and enhancing</del> <b>Managing</b> ecosystems and habitats that provide nature-based		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans			solutions to climate change - district and regional plans		
<b>FS20.101</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Ātiawa oppose these submission point, the rationale is incorrect - the draft NPS-IB sets out that (in many clauses) that indigenous biodiversity must be protected. Given the extent of the loss of indigenous biodiversity it would be inappropriate to only manage the remnants, there must be conscious action (including strong policy direction) to protect, restore and enhance indigenous biodiversity.	Disallow		Accept in part
<b>S131.053</b>	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Ātiawa want nature based solutions; and we want to ensure that the ecosystems and habitats that support those nature based solutions are protected/enhanced/restore.	Amend to: <b>Policy CC.7: Providing for nature-based solutions to climate change in development and infrastructure planning and design.District and regional plans shall include objectives, policies, rules and methods to protect, restore and enhance ecosystems and habitats that provide nature based solutions and mātauranga Māori approaches to climate change, including development and infrastructure planning</b>		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					<p>and design. Priority shall be given to actions that provide the greatest cobenefit for climate change mitigation and adaptation, indigenous biodiversity, fresh and coastal water. District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design.</p>		
<p><b>FS29.323</b></p>	<p>Ngā Hapu o Otaki</p>	<p>Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans</p>	<p>Support</p>	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degredation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>	<p>Not stated</p>		<p>Accept in part</p>

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S133.040	Muaūpoko Tribal Authority	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	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.		Accept in part
FS20.387	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.	Disallow	Disallow the whole submission	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S134.008	Powerco Limited	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Nature based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment. Nor is it clear how nature-based solutions could perform the role of 'traditional infrastructure' such as gas and electricity distribution networks.	<p>Amend Policy CC.7 to recognise the nature-based solutions may not be practicable in all situations and will not necessarily be able to perform the role of regionally significant infrastructure. This could be achieved by making changes along the following lines:</p> <p>"District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, <b>where practicable</b>.</p> <p>Explanation:</p> <p>Development and infrastructure planning and design should include nature-based solutions <b>where practicable</b> as standard practice, including green infrastructure, green spaces, and environmentally friendly design elements, to manage issues such as improving water quality and natural hazard protection. Nature-based solutions can <b>assist in</b> perform the roles of traditional infrastructure, while also building resilience to the impacts of climate change and providing benefits for indigenous biodiversity and community well-being."</p>		Accept in part
S144.008	Sustainable Wairarapa Inc	Policy CC.7: Protecting, restoring, and enhancing ecosystem	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services , such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		s and habitats that provide nature-based solutions to climate change - district and regional plans					
<b>S147.051</b>	Wellington Fish and Game Council	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified		Accept in part
<b>FS19.115</b>	Wellington Water Ltd ("Wellington Water")	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS30.220	Beef + Lamb New Zealand Ltd	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	That the submission be disallowed with the exception of 147.007	Reject
S157.009	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Nature based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment.  Nor is it clear how nature-based solutions could perform the role of 'traditional infrastructure' such as regionally significant bulk fuel supply infrastructure.	Amend Policy CC.7 to recognise the nature-based solutions may not be practicable in all situations and will not necessarily be able to perform the role of regionally significant infrastructure. This could be achieved by making changes along the following lines:  "District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, <b>where practicable</b> .  Explanation:  Development and infrastructure planning and design should include nature-based solutions <b>where practicable</b> as <del>standard practice</del> , including green infrastructure, green spaces, and environmentally friendly design elements, to		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
					manage issues such as improving water quality and natural hazard protection. Nature-based solutions can <b>assist in perform the roles of traditional infrastructure</b> , while also building resilience to the impacts of climate change and providing benefits for indigenous biodiversity and community well-being.		
<b>S163.048</b>	Wairarapa Federated Farmers	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Defer to the full review of the RPS in 2024.  Concerned that "nature based solutions" are not explicitly exempt from being "significant natural areas" (SNAs) in RPS Change One and that regulatory roadblocks to beneficial nature-based solutions have not been addressed. Refer to submission for more details.	That Policy CC.7 be deleted  Delete the FW icon		Reject
<b>FS7.092</b>	Royal Forest and Bird Protection Society (Forest & Bird)	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS20.214	Ātiawa ki Whakaron gotai Charitable Trust	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
FS29.065	Ngā Hapu o Otaki	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Section 18, page 4: General Comments - OPPOSE  Section 25, Page 5 Going Forward - OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated		Accept
FS30.121	Beef + Lamb New Zealand Ltd	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		solutions to climate change - district and regional plans					
<b>S165.040</b>	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	This accords with Te Mana o te Taiao Aotearoa New Zealand Biodiversity Strategy 2020	Retain.		Accept in part
<b>FS30.319</b>	Beef + Lamb New Zealand Ltd	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
<b>S166.047</b>	Masterton District Council	Policy CC.7: Protecting, restoring, and enhancing ecosystem	Support	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.	Retain as notified.  However:  Develop a corresponding non-regulatory method to		Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
		s and habitats that provide nature-based solutions to climate change - district and regional plans			develop guidance to support this policy.		
<b>S168.097</b>	Rangitāne O Wairarapa Inc	Tree canopy cover	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.		Accept
<b>FS31.207</b>	Sustainable Wairarapa inc	Tree canopy cover	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.  Nga mihi nui Ian Gun	Not stated		Accept
<b>S165.0143</b>	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Tree canopy cover	Support		Retain		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS30.319	Beef + Lamb New Zealand Ltd	Tree canopy cover	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
S170.082	Te Rūnanga o Toa Rangatira	Objective CC.6	Not Stated / Neutral	<p>The nature-based solutions suggest that there are a handful of proven and trustworthy solutions and proposals in place to responding to Climate Change. However, if looked closer, this objective targets increasing planting practices, as well as the planting extent that aims to achieve multiple outcomes as a core part of climate change adaptation. It is encouraging to see the role of increasing our forest cover and ecosystems, however the current phrasing and content of the Objective and what is actually meant, could lead to misunderstanding of offering less of a kete of larger solutions.</p> <p>The consideration behind preparing forest spatial plans seem to align with the intention of increasing forest cover for climate change adaptation purposes. However, it is unclear whether such exercise is time and resource intensive and could draw us away from the implementation path. Another question regarding spatial forest plans is that how this impacts on land ownership and land use.</p>	Clarify/assess whether forest spatial plans could draw us away from the implementation path, as well as the impact on land ownership and land use.		Accept in part
S17.003	Chelsea Kershaw	General comments - urban development	Support	Creating climate-resilient urban areas is supported.	Retain, refine and enhance provisions.		Accept
S22.003	Tegan Mc Gowan	General comments - urban development	Support	Support creating climate-resilient urban areas.	Retain, refine and enhance provisions.		Accept
S24.003	Helen Payn	General comments - urban development	Support	Creating climate-resilient urban areas is supported.	Retain, refine and enhance provisions.		Accept
S28.004	Philippa Yasbek	General comments - urban development	Support	Support creating climate-resilient urban area.	Retain as notified.		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S35.006	Oliver Bruce	General comments - urban development	Support	Support provisions relating to climate-resilient urban areas.	Provisions should be retained, refined and enhanced.		Accept
S37.006	Jennifer Van Beynen	General comments - urban development	Support	Support provisions relating to climate-resilient urban areas.	Retain, refine and enhance provisions.		Accept
S51.007	Khoi Phan	General comments - urban development	Support	Support provisions relating to creating climate-resilient urban areas.	Retain, refine and enhance provisions.		Accept
S53.006	Ellen Legg	General comments - urban development	Support	Support the provisions for creating climate-resilient urban areas.	Retain as notified.		Accept
S60.007	Grant Buchan	General comments - urban development	Support	Support creating climate-resilient urban areas.	Retain, refine and enhance provisions.		Accept
S61.007	Patrick Morgan	General comments - urban development	Support	Support creating climate-resilient urban areas..	Retain, refine and enhance provisions.		Accept
S64.005	Rachel Bolstad	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Retain, refine and enhance provisions.		Accept
S76.007	Gene Clendon	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Retain, refine and enhance provisions.		Accept
S90.007	Bronwyn Bell	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Retain, refine and enhance provisions.		Accept
S92.003	Ruby Miller-Kopelov	General comments - urban development	Support	Creating climate-resilient urban areas is supported	Retain, refine and enhance provisions.		Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
<b>S93.003</b>	Isabella Cawthorn	General comments - urban development	Support	Creating climate-resilient urban areas are supported.	Retain, refine and enhance provisions.		Accept
<b>S152.008</b>	Michelle Ducat	General comments - urban development	Support	Support provisions relating to climate-resilient urban areas.	Provisions should be retained, refined and enhanced.		Accept
<b>S164.006</b>	Megan Lane	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Provisions should be retained, refined and enhanced.		Accept
<b>S32.009</b>	Director-General of Conservation	General comments - regulatory policies	Support in part	The proposed changes appropriately respond to climate change and national direction.  In particular, the promotion of indigenous over exotic species for permanent forests (Policy CC.6), and support for nature-based solutions (Policy CC.7), provide additional biodiversity benefits.	Retain as notified, except where specific changes are requested below.		Accept in part
<b>FS30.287</b>	Beef + Lamb New Zealand Ltd	General comments - regulatory policies	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject