

25 July 2025

Ministry for the Environment - Manatū Mō te Taiao

Tēnā koutou,

## **Submission on Proposed Changes to National Direction**

Greater Wellington Regional Council - Te Pane Matua Taiao (Greater Wellington) thanks the Ministry for the Environment - Te Manatū Mō te Taiao (the Ministry) for the opportunity to make a submission on proposals to update national direction instruments under the Resource Management Act 1991 (RMA). This letter and attachment provide high-level comments on the consultation packages, alongside our responses to the questions in the consultation portal. In summary:

- We are concerned that the proposed reforms risk undermining the Crown's Tiriti o Waitangi obligations, including through changes to Te Mana o te Wai, the "rebalancing" of freshwater management and move toward more permitted activities without role of mana whenua.
- We oppose the weakening of some environmental protections; especially for wetlands, coastal areas, and commercial forestry, and are concerned about the added complexity that may be introduced to the National Objectives Framework.
- We support proposals that enhance water security and storage, uphold principled development, and ensure infrastructure planning reflects mana whenua and community interests alongside strong environmental safeguards.

As a regional council, our role is to protect and enhance te taiao while supporting the cultural, social, and economic aspirations of our communities in the Greater Wellington region. We are responsible for environmental management under the RMA, flood protection, land use and transport planning, regional parks, public transport (through Metlink), and metropolitan bulk water supply. These responsibilities are carried out with a long-term view to sustainability, resilience, and equity.

Our statutory functions, particularly in environmental policy, planning and regulation, are directly relevant to the proposed national direction. We are responsible for plan-making, resource consenting, compliance monitoring and enforcement under the RMA, implementing the National Policy Statement for Freshwater Management (NPS-FM), the National Policy Statement for Indigenous Biodiversity (NPS-IB), and associated regulations.

We recognise the Government's desire to remove complexity from the system and consider that there are benefits to doing so. We consider that the current resource management system is complex, unwieldy and costly to administer and there is a case for some changes. We believe that there are ways the proposed changes to national direction could be improved while not compromising this goal.

### **Continuous reform is costly for everyone**

Ongoing shifts in resource management legislation and national direction creates costs and uncertainty for our partners, resource users, councils, communities, and the environment. Councils and communities need durable bipartisan policy settings that provide long-term certainty and enable communities to plan confidently without fear that the goalposts will shift again.

Greater Wellington, our mana whenua partners and communities have invested significant time and resource into the Whaitua process and subsequent plan change work to meet the requirements of national direction on freshwater management. Revising or redoing this work will add additional time and expense on top of the approximately \$7,160,000 spent so far on NPS-FM plan change work between July 2021 and May 2025 – a figure that does not include the investment in the Whaitua processes themselves.

The volume of submissions required from our officers to respond to government proposals to change legislation and regulations is substantial. This resource commitment is not matched by visible benefits to our partners, communities, resource users, and ratepayers. We ask the government to consider the cumulative burden of reform and ensure that future reforms are streamlined, well-supported and bi-partisan wherever possible.

Some proposed changes appear to enable greater trade-offs between environmental, social, and economic outcomes. While flexibility is important, increased ambiguity in evaluating these trade-offs will lead to greater complexity, economic inefficiency, and implementation challenges. Clear, consistent direction is essential for effective planning and lower compliance costs. Where possible, Greater Wellington has provided suggestions to address this in the accompanying table.

### **Concern the proposals undermine the Crown's Tiriti obligations**

We are deeply committed to our enduring partnerships with mana whenua, built over more than 30 years. These relationships are central to our success in protecting the environment and delivering infrastructure that meets the needs of our region. We recognise that local government plays a critical role in giving effect to Te Tiriti o Waitangi, and we take seriously our position as a visible representative of the Crown in our communities.

We are concerned that proposals in the National Direction packages are perpetuating structural exclusion of Māori, weakening hard-won gains in environmental governance. Across the three packages, there is:

- a shift away from local decision-making, towards more centralised decision-making, often without adequate provision for iwi and hapū roles, rights and interests
- a weakening of references to tikanga, mātauranga and Māori values
- insufficient consideration of the cumulative effects on Māori rights to land, water and other taonga.

### **Oppose changes to Te Mana o te Wai and “rebalancing” freshwater management**

Te Mana o te Wai is the foundational concept of the NPS-FM. In line with kaitiaki responsibilities of mana whenua as stated in the RMA, it represents a holistic and integrated approach to freshwater management that prioritises:

1. The health and well-being of water bodies and freshwater ecosystems
2. The health needs of people (such as access to safe drinking water)
3. The ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

This hierarchy of obligations ensures that the life-supporting capacity of freshwater is protected first and foremost, recognising the intrinsic value of water and its central role in the health of the environment, communities, and the economy. Only when the water is well can it support the health and wellbeing of people, their lives, and their livelihoods.

Greater Wellington is deeply concerned about any proposals that would flatten this hierarchy or replace Te Mana o te Wai with a set of competing objectives. Such changes would dilute the clarity and strength of the current framework, undermine the progress made in freshwater protection, and risk reversing environmental gains. Te Mana o te Wai is not just a policy tool, it is a values-based framework that reflects Te Ao Māori and the Treaty partnership, and it must be upheld in both principle and practice.

In Wellington, our Whaitua Committees, comprising community, council and mana whenua representatives spent years navigating the pace and cost of freshwater reform – and spent considerable time debating who bears that cost. This work was grounded in Te Mana o te Wai or placing the health of the water first. Flattening or replacing this framework would undo hard-won progress and weaken Māori participation in freshwater governance.

We do not support the proposed “rebalancing” of Te Mana o te Wai. It risks prioritising commercial interests over environmental and cultural values and undermines Treaty obligations affirmed by the courts. There is no clear pathway for genuine partnership with Māori in these proposals. We urge the Ministry to retain Te Mana o te Wai in its current form and to continue supporting councils and mana whenua in giving effect to it through local implementation.

### **The new proposed national direction impacts on Treaty settlement redress**

Many of the mechanisms provided within Treaty settlements connect into regional planning and consenting processes. Setting more standards at the national level that don't provide for partnership can undermine the settlements/existing redress mechanisms through lessening involvement in planning and consenting.

For example, both the Ngāti Toa Rangatira Deed of Settlement Act (2014) and the Port Nicholson Block Settlement Trust (Taranaki Whānui) Deed of Settlement (2008) include statutory acknowledgments over water bodies and land including Te Awarua-o-Porirua Harbour (Ngāti Toa) and Te Awakairangi/Hutt River (Taranaki Whānui). These acknowledgments require us to include summaries of these in our regional plans, provide notice to mana whenua when resource consent applications are received, and have regard for the statements when making resource consent decisions. These arrangements are intended to give mana whenua real influence over land and water governance and resource use, influence which could be sidelined if national direction precludes or overrides regional planning provisions or limits council discretion to engage with iwi in a way that reflects these arrangements.

### **We support proposals that enhance water security and storage**

We are open to proposals that enhance water security and storage, provided they are environmentally sustainable and culturally appropriate. These initiatives can support resilience in the face of climate change, and benefit both urban and rural communities.

Water storage or “water capture” is one of five key workstreams in the Wairarapa Water Resilience Strategy, in which Greater Wellington is one of the four partner councils, working with mana whenua. Improving water resilience in the Wairarapa is critical in the face of lower predicted rainfall and anticipated growth while needing to preserve the health and life-giving capacity of water.

### **Provisions to protect and restore wetlands should remain**

Wetlands are highly valued by our communities and mana whenua partners, recognised as taonga and integral to whakapapa. Our Whaitua processes and recent regional surveys confirm this deep connection. Any changes to the provisions protecting wetlands will be closely scrutinised.

The current RMA definition, alongside NPS-FM exclusions, has been tested through the courts and is well understood by councils and practitioners. Introducing new definitions or exclusions will create uncertainty, incur costs for all parties, and risk further wetland loss while interpretations are clarified.

### **Regulation of Commercial Forestry should not be more permissive**

Greater Wellington does not support stricter criteria for regional rules being more stringent than NES-CF regulations. The existing Section 32 and Schedule 1 processes provide sufficient justification for region-specific protections. We oppose any move to make the NES-CF more permissive, increasing the impacts on te taiao, and reducing opportunities for local communities to influence landscape-scale industry for decades.

Greater Wellington's position in Plan Change 1 to our Natural Resources Plan has been to adopt a more stringent approach than the NES-CF. This is likely to be the most effective way of managing sediment runoff in catchments that are already adversely affected by high sediment loads. Afforestation is also a tool to help address the impacts of climate change.

### **Proposed changes to the National Objectives Framework for Freshwater (NOF) add complexity**

Allowing councils to define bottom lines locally will make the NOF process slower, costlier, and more contentious. If science changes, national thresholds should be updated centrally, not devolved. For degraded rivers, the NPS should support meaningful improvement, recognising the challenges this presents in some catchments. Economic cost is not a valid reason to lower environmental standards.

Retaining the 2027 deadline to notify a proposed plan change to implement the NOF is unrealistic. Working with communities and mana whenua on complex reforms takes time. Our Whaitua processes that have been run under evolving NPS versions show that durable outcomes require patience and trust. The amount of time needed to incorporate a new NPS-FM into existing plans will need to be factored into transitional arrangements.

### **We oppose revisions to the New Zealand Coastal Policy Statement**

We oppose revisions to the NZCPS that would weaken environmental protections in favour of enabling priority activities. Infrastructure and port operations are important, but to be sustainable they must work in concert with biodiversity, coastal water quality, and marine ecosystem resilience.

### **Infrastructure should include mana whenua and community interests and environmental protections**

Greater Wellington plays multiple roles - as a public transport authority, a member of the Wellington Regional Leadership Committee, and as guardian of environmental values. The proposed NPS-I highlights tensions between these roles. While not inherently incompatible, they require careful trade-offs to deliver community outcomes.

The NPS-I elevates infrastructure provisions to a matter of national importance under the RMA. Provisions requiring decision-makers to "recognise and provide for" infrastructure benefits and operational needs risk overriding mana whenua interests, community aspirations and environmental protections. The scope of infrastructure is broad and includes private waste facilities, which raises further questions about interpretation and impact.

Infrastructure can be developed by, with and for the benefit of mana whenua and Māori. However, it is well documented including within historical accounts of Treaty settlements how various types of infrastructure and public works have been developed without involvement by and to the detriment of mana whenua, including in the Wellington region. The impacts continue with the legacies of existing infrastructure.

The policies as drafted don't fulfil the Crown's apologies and commitments to new Tiriti-based relationships, nor the responsibilities to Māori outlined and required within Part 2 of the RMA. While the NPS-I may accelerate urban regeneration, it also risks long-term environmental degradation, creating a legacy of burden on future generations.

### **Support for the National Policy Statement for Natural Hazards**

Greater Wellington broadly supports the proposed NPS for Natural Hazards, noting some concerns that we've reflected below. The new NPS-NH will strengthen risk-based spatial planning and help guide more appropriate land use decisions. This is critical in a region highly exposed to earthquakes, flooding, landslides, and other hazards such as the Wellington region. The long lifespan of infrastructure means a 100-year planning horizon is essential.

However, the NPS includes no recognition of the role of mana whenua in identification or assessment of natural hazards. The Ministry received feedback from Māori on a policy within its earlier NPS proposal on Natural Hazard Decision-making that can be referred to, in order to improve the current consultation proposal.

We are also concerned that the current framing excludes both infrastructure and the resilience of the natural environment. A holistic approach is needed, one that recognises how natural systems interact with built and economic domains. The government's own climate risk assessment methodology includes the natural environment, and this should be reflected in the NPS. Infrastructure was also included in the 2023 draft of the NPS-NH and should be retained.

### **Principled Development Examples**

We urge the Ministry to consider how national direction can better incentivise sustainable practices and development in appropriate areas, reducing tension between environmental protection and economic growth.

To illustrate our positions on all packages, we suggest including examples of development that align with all three reform packages. For instance:

- Transit-oriented development in Johnsonville: this model reduces environmental pressure, supports economic growth, and aligns with urban intensification goals.
- Riparian planting by farmers is a positive example of incentivising desired behaviour and having significant positive outcomes - rather than relying solely on restrictions.

While national direction is a critical component of the RM reform package, it is important to recognise that it sits within a much wider system change. We encourage the Government to articulate a coherent vision for how the full reform programme will be implemented, ensuring that the cumulative impact is understood and integrated, and that local government is supported to play its essential role in delivering the outcomes of this transformation.

We appreciate the opportunity to contribute to this important conversation and urge the Ministry to ensure national direction reflects shared values and delivers enduring benefits for our environment, our communities, and future generations.

Ngā mihi nui,

A handwritten signature in blue ink, appearing to read 'Ad Staples'.

**Councillor Adrienne Staples**  
Deputy Chair

A handwritten signature in black ink, appearing to read 'Penny Gaylor'.

**Councillor Penny Gaylor**  
Environment Committee Chair

## Greater Wellington Regional Council submission on National Direction consultation packages July 2025

Package summary	Topic	Govt summary of the proposal(s)	Submission points from Greater Wellington Regional Council
<p><b>FRESHWATER</b></p> <p>The proposals set out in this discussion document are designed to equip regional councils to manage freshwater resources in a way that is efficient, effective, and aligned with the Government's goals. In addition, we are seeking feedback on proposals that will address barriers to investment in water storage and provide clearer rules for food production and wetland management.</p> <p>Further consultation will be undertaken through an exposure draft.</p>	<p><b>rebalancing freshwater management through multiple objectives</b></p>	<p>The Government is consulting on whether to replace the NPS-FM's single objective (hierarchy of obligations) with multiple new objectives.</p> <p>A new objective that will direct councils to:</p> <ul style="list-style-type: none"> <li>• safeguard the life-supporting capacity of freshwater and the health of people and communities</li> <li>• while enabling communities to provide for their social, cultural and economic well-being, including productive economic opportunities.</li> </ul> <p>A new objective to consider the pace and cost of change, and who bears the cost. This would support councils and communities to have balanced conversations about their aspirations for the environment.</p> <p>A new objective including the requirement to maintain or improve freshwater quality.</p>	<p><b>GWRC do not support the inclusion of new objectives in the NPS-FM. The single objective in the NPS-FM 2020 should remain.</b></p> <p>We have the following comments about the proposed new objectives.</p> <ul style="list-style-type: none"> <li>- The “life-supporting capacity” of freshwater can be a low bar, and if it is used it would be essential to pair it with an objective to “maintain or improve”.</li> <li>- Mechanisms exist in the current framework to consider the pace and cost of change, and who bears the cost. Section 32 analysis requires this when proposing a plan-change, and section 42a analysis requires it in response to submissions. Specifically in the Wellington context, our Whaitua Committees spent significant time deliberating the pace and cost of change, and which parts of their community would bear the cost – which is why the Whaitua process took so long. The long-term costs to our communities, industries, ecosystems and ecosystem services of continuing to allow the degradation of our freshwater resources are considerably greater than the costs of seeking improvement.</li> <li>- Changing the objectives would require GWRC to revisit all the work done as part of the Whaitua processes completed to date (five out of six). Any changes to the NPS- FM will impact how much previous work can still be used in implementation, and how much will need to be done again or discarded to comply with any new process. This could render obsolete the years of time and effort from our mana whenua partners, community members, regional and district councillors, and GWRC officers, and millions of dollars of investment in the processes designed to implement previous government direction.</li> <li>- Even seemingly small changes to the NPS-FM will require considerable reanalysis of the work GWRC has led to date, and we believe we would struggle to meet the 2027 deadline. Our regional plan is an integrated planning instrument and reworking it would be a significant undertaking. Engagement with our communities on the changes would also be required - and meaningful engagement takes time. The deadline needs to be extended.</li> <li>- It would be useful for the NPS to clarify how long a long-term goal is. Interim limits of only 10 years remove the flexibility of working towards the long-term goals. Freshwater improvements can often take a long time and are not usually linear.</li> <li>- A freshwater management framework that does not drive improvement in water health and availability will hinder economic growth and prosperity. Poor water quality and declining availability can lead to degraded ecosystems, which in turn affect the reliability of freshwater sources. This impacts sectors like agriculture, manufacturing, and tourism, all of which depend on clean and sufficient water supplies. When water health deteriorates, treatment costs rise—for drinking water, industrial use, and wastewater management. These increased costs can burden local governments, businesses, and households.</li> </ul>
	<p><b>rebalancing Te Mana o te Wai (letter)</b></p>	<p>Option 1: Remove hierarchy of obligations and clarify how Te Mana o te Wai applies</p> <p>Option 2: Reinstate Te Mana o te Wai provisions from 2017</p> <p>Option 3: Remove Te Mana o te Wai provisions</p>	<p><b>GWRC do not support changes to Te Mana o te Wai or the hierarchy of obligations. GWRC does not support amendments made to ‘rebalance’ the NPS-FM.</b></p> <p>The health, vitality, and power of our waterways to support the economy and prosperity of Aotearoa and all New Zealanders has degraded significantly over the last 50-100 years, and it is going to take longer than 5 years to begin to heal and restore our freshwater resources. Changing the NPS-FM introduces further delays on the path to health and prosperity.</p> <p>‘Balancing’ was attempted in the decades before the hierarchy was introduced and did not halt the decline in freshwater quality and ecosystem health. Water quality improvements won’t happen by ‘balancing’. ‘Balancing’ Te Mana o te Wai with the ‘interests of all water users’ will result in advancing commercial outcomes and personal wealth over the healthy and sustainable environment New Zealanders seek. Activities that degrade freshwater must not be ‘balanced’ against the essential health of our freshwater.</p> <p>Removing or weakening Te Mana o te Wai provisions diminishes the recognition and protection of Māori interests in freshwater as recognised by the Courts (<i>NZ Māori Council v Attorney-General [2013] NZSC 6</i>)</p> <p>The hierarchy within Te Mana o te Wai, prioritises the health of water bodies before human or economic uses, which reflects the values of Māori and obligations under Te Tiriti o Waitangi. Replacing or removing this hierarchy will limit the role of mana whenua</p>



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			participation in freshwater governance and risks the progress made with our mana whenua partners through the Whaitua processes. The proposals to change the NPS-FM provide no indication of meaningful partnership with Māori.
	<b>providing flexibility in the National Objectives Framework</b>	<p>We are consulting on whether or not to retain some elements of the NOF and make it more flexible to implement. This consultation covers:</p> <ul style="list-style-type: none"> <li>• which values should be compulsory to provide for, and which should be optional</li> <li>• which attributes and national bottom lines are critical for councils to manage nationally</li> <li>• whether to give councils flexibility to deviate from the nationally defined thresholds.</li> </ul>	<p>While reducing the number of compulsory values or thresholds might streamline catchment planning processes, it risks undermining environmental outcomes. Fewer mandatory values could simplify engagement and decision-making, but increased flexibility in target setting may lead to greater scrutiny of the science and rationale behind chosen values. This could complicate community processes and weaken the ability to maintain or improve freshwater health.</p> <p>Nationally defined bottom lines and attributes are essential for ensuring consistent environmental protection across regions. Making these flexible could increase complexity, cost, and legal risk for councils, who would need to justify and defend locally derived thresholds. Some attributes may not be relevant to all catchments, but national consistency ensures scientific integrity and fairness. Where rivers fall below national bottom lines, the NPS should provide a clear, nationally supported pathway for gradual improvement, acknowledging that some catchments may never return to pristine states.</p> <p>Greater flexibility in how councils achieve environmental outcomes could allow for more tailored, catchment-specific approaches (e.g., using policies or action plans instead of strict rules). However, shifting responsibility to councils to define and defend thresholds would significantly increase workload, cost, and risk of legal challenge. The current NOF process is prescriptive, and the discussion document's vaguer language raises concerns about how community and mana whenua engagement will be interpreted. Effective engagement takes time and does not guarantee consensus or prevent adversarial positions later in formal processes. Councils need clarity, time, and support to implement national direction meaningfully and equitably.</p>
	<b>enabling commercial vegetable growing</b>	<p>Option 1: a new objective in the NPS-FM to enable the continued domestic supply of fresh vegetables, and in doing so, to provide for crop rotation.</p> <p>Option 2: developing new national standards that permit commercial vegetable growing.</p>	<p><b>GWRC do not support a new objective for the NPS-FM regarding vegetable growing.</b> The single objective should remain.</p> <p>GWRC acknowledge the value and importance of domestic vegetable growing. However, this should not mean that catchments where horticulture occurs should be allowed to have lower freshwater quality and ecosystem health standards.</p>
	<b>addressing water security and water storage</b>	<p>We are consulting on providing direction to councils through a new objective or policy in the NPS-FM to address the issue of water security as part of climate change resilience.</p> <p>- whether to develop new national standards that permit the construction of off-stream water storage.</p>	<p><b>GWRC do not believe that this direction is required or that it will enable more off-stream water storage.</b></p> <p>Our regional plan is already enabling / permissive of off-line water storage. We have a PA earthworks rule which would enable construction as a permitted activity, and we have a PA rule for the take of water from the storage facility. We understand that the lack of successful proposals to create offline storage facilities (in our region and others) is related to the ability to fill the storage facility with water (water allocation is out of scope of this proposal), and the use of existing water courses to distribute water from the facility.</p>
	<b>simplifying the wetlands provisions</b>	<p>We are consulting on:</p> <p>- defining induced wetlands</p>	<p><b>GWRC caution changes to the wetlands provisions. With less than 3% of the original wetland extent remaining in the region changes to definitions could have critical impacts on our wetland taonga.</b></p>

## Greater Wellington Regional Council submission on National Direction consultation packages July 2025

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		<ul style="list-style-type: none"> <li>- removing the pasture exclusion from the definition of a 'natural inland wetland'</li> <li>- creating a new permitted activity standard (and potentially a consenting pathway if needed) for farming activities</li> <li>- defining 'wetland construction'</li> <li>- creating a new permitted activity standard for activities related to wetland construction as well as a consenting pathway</li> <li>- further encouraging wetland construction and edge-of-field mitigations through a new objective and/or policy in the NPS-FM</li> <li>- Removing the requirement for councils to map natural inland wetlands within 10 years</li> </ul>	<p>We know from our Whaitua processes and a recent survey on wetlands in the region that wetlands are highly valued by our communities, including as taonga and part of the whakapapa of our mana whenua partners. Changes to provisions that protect our remaining wetlands will be thoroughly scrutinised.</p> <p>The current definitions and regulations are not perfect – however there are huge costs, uncertainty and delays associated with changing definitions in particular. We support keeping the RMA definition of a wetland and using exclusions to remove those features which are not intended to be captured. The legal definition of a wetland needs to be stable for landowners, regulators and industry to have certainty over what a wetland is/not, how to determine what is/not considered a wetland, and which activities are allowed in wetlands with/without a resource consent. There is greater certainty and fewer costs associated with changing the rules and policies that apply to those features than changing the definition of what constitutes a wetland.</p> <p><b>- defining induced wetlands</b></p> <p>At present it is relatively clear that all wetlands are considered under the regulations unless they are deliberately constructed. It is our preference that this clarity remains.</p> <p>Wetlands used to be widespread, and landowners were encouraged to drain them. They will reform if the landform or hydrology changes either naturally or through human activity. If the definition is poorly worded or too broad, landowners/applicants/consultants will describe anything that has formed since European settlement (and widespread forest clearance) as induced e.g. hillside seepages. This could cause widespread confusion and lead to significant loss of remaining wetland extent.</p> <p>'Induced wetland' will be very difficult to accurately define. The definition would need to be carefully worded and include identification of activities which induce wetlands, but should also include appropriate protections for habitats of threatened species.</p> <p>There will need to be clarity around 'induced' wetlands vs wetlands which have formed as a result of seasonal variation, climate change, natural ecological change, or cascade effects from major infrastructure projects. There would also be benefit from clarifying "induced" vs. "developed around deliberately constructed waterbody".</p> <p><b>- removing the pasture exclusion from the definition of a 'natural inland wetland'</b></p> <p>GWRC do not support removing the pasture exclusion from the definition of natural wetland. The current RMA definition, coupled with the NPS FM exclusions has been tested by the courts, and local government and industry professionals know what is expected. Any changes will be costly and time-consuming while interpretation of any new definitions or exclusions are clarified and tested, and wetlands will continue to be lost and degraded in the interim.</p> <p>We have spent years refining our application of the pasture exclusion to a point of confidence and consistency in identifying natural inland wetlands. Suggesting the removal of the pasture exclusion does not appear to have considered the application of vegetation, hydrology, and soils tests or the ongoing need for these in delineating wetlands where there is dispute.</p> <p>Removal of pasture exclusion is unlikely to have the effect sought. The pasture exclusion is one small component of a vegetation assessment - which is still required to determine whether a site is wetland or not. A site visit by an expert is still needed in most instances to use the wetland delineation tool. Its removal could have the opposite effect and make restrictions on farming activities around 'low-value wetlands' more restrictive (depending what activities are included in proposed PA farming rule).</p> <p>Removing the pasture exclusion will not reduce costs to landowners (as the delineation of a wetland requires an on-site vegetation assessment regardless) except in circumstances where the presence of a wetland is not of significance to whether an activity can proceed or not – which makes the details of the proposed permitted activity for farming critical to understand the impact of this change on wetland regulations.</p> <p>The pasture exclusion currently has no role in greenfield/housing/urban development/ infrastructure as the site is not subject to grazing, therefore will result in no change to developer costs/processes.</p>

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			<p><b>- creating a new permitted activity standard (and potentially a consenting pathway if needed) for farming activities</b></p> <p>GWRC support the inclusion of a permitted activity standard for farming activities unlikely to have an adverse effect on a wetland if these activities are tightly defined, and appropriate conditions are included. We will need to review specific drafting to comment in more detail.</p> <p>Activities that GW consider appropriate are: fencing within the 10m buffer of a wetland; fencing within a wetland (by hand-held machinery only) where fencing within the 10m buffer is impractical; the use of water (irrigation) within 100m of a wetland (our assessments are concluding the effects are no more than minor in most instances).</p> <p>Taking water from wetlands, the use of machinery or vehicles, and vegetation clearance <i>inter alia</i> should not be permitted activities.</p> <p><b>- defining ‘wetland construction’</b></p> <p>Strongly support a clear definition of constructed wetland. Historically, natural wetlands have been modified to create features we would consider constructed wetlands (water storage, dams, amenity ponds). Any definition needs to consider remnant wetland habitat in vicinity/hydrologically connected to ‘constructed feature’, and the diversion of water and the impacts elsewhere of doing so.</p> <p>The construction of a functional wetland is most likely to be successful within existing wetlands or land that used to be wetland (with suitable soil types) so care needs to be taken to distinguish construction of a new wetland from restoration.</p> <p>Important to distinguish between a ‘constructed wetland’—a constructed system designed to function as natural wetland—and the implementation of constructed features, such as weirs, intended to enhance the natural hydrology of an existing wetland. A clear definition should differentiate these two approaches.</p> <p><b>- creating a new permitted activity standard for activities related to wetland construction as well as a consenting pathway</b></p> <p>We support the overall direction of making constructed wetlands easier to implement through clearer definitions and permitted activity pathways. However, this shouldn’t come at the expense of existing natural wetlands. Any construction activities within existing natural wetlands should be limited to restoring their ecological characteristics or expanding their hydrological extent.</p> <p>Definition and direction around constructed wetlands might consider a hierarchy of location selection, including places where a wetland is so degraded that it no longer meets the definition of ‘natural inland wetland’, but has the potential for natural wetland function to be reintroduced. Any potential consenting pathway would also need careful consideration of the purposes for allowing construction of a wetland and whether these incentivise construction over restoration or protection of existing natural inland wetlands, as seems likely. Consideration needs to be given to the diversion of water and the impacts elsewhere of doing so.</p> <p><b>- further encouraging wetland construction and edge-of-field mitigations through a new objective and/or policy in the NPS-FM</b></p> <p>GWRC do not support a new objective for the NPS-FM. The single objective should remain.</p> <p>We support a policy for enabling wetland construction and edge-of-field mitigations to address catchment-specific issues i.e. nitrate.</p> <p><b>- removing the requirement for councils to map natural inland wetlands within 10 years</b></p> <p>GWRC are undertaking wetland mapping across the region and will continue to do so as we need to know where wetlands are to evaluate whether GW are (a) achieving no net loss of wetland extent, and (b) enforce any rules relating to wetlands (in national or regional policy). The removal of the deadline to map natural inland wetlands recognises the scale of this task nationally. Retaining the requirement to monitor extent and condition would ensure that maps are still generated at an affordable pace and available to monitor national and regional policy effectiveness.</p> <p><b>GWRC will respond to the questions on “simplifying the wetland regulations” in the online survey.</b></p>

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	<b>simplifying the fish passage regulations</b>	We are consulting on whether to simplify fish passage regulations in the NES-F or retain the current regulations.	<p><b>GWRC support simplifying the fish passage regulations for clarity and ease of use, but caution against reducing the information requirements.</b></p> <p>The problem definition in the interim RIS is reasonable, but the proposed changes don't effectively address it. They focus on the wrong areas and should instead aim to make the rules clearer, especially around the permitted activity rule, without overlooking potential impacts. The devil is in the detail - we need to see the full suite of proposed drafting amendments to comment on their efficacy and effectiveness.</p> <p>GWRC support consolidating information into a single regulation for all structures, support updating permitted activity conditions for culverts to reflect updated practice, and to provide for boxed culverts. This is in line with the updated fish passage guidelines.</p> <p>GWRC do not support the proposals to “remove requirements that do not directly inform how likely a structure is to impede fish passage” as we disagree that this information is not relevant. Removing these requirements won't contribute meaningfully to simplifying the regulations; the information is easy to collect and provide; and is relevant in assessing the impact of a proposed structure. For example, the landowner / applicant will know what material they are proposing to build the structure with, and the material used can significantly impact fish passage.</p> <p>We do not support removing the requirement that substrate is stable (NES-F Reg 70 (2)(f)).</p> <p>We do not support removing some permitted activity conditions for culverts (e.g., water velocity). Water velocity is one of the major barriers to fish passage.</p> <p>We do not support a 60-day period for temporary culverts – this is too long for most construction periods, and tying it to migration periods is tricky for rivers with multiple species. Easier to have a shorter period as a PA (e.g. 7-14 days). Having PA conditions for temporary culverts is more efficient than allowing councils to be less stringent.</p> <p><b>GWRC will respond to the questions on “simplifying the fish passage regulations” in the online survey.</b></p>
	<b>addressing remaining issues with the farmer-facing regulations (i.e. synthetic nitrogen fertiliser)</b>	<p>We are consulting on whether to repeal the requirement for dairy farms to provide receipts for purchases of synthetic nitrogen fertiliser.</p> <p>We are also consulting on whether to align the reporting date in the NES-F with the farming calendar.</p> <p>We are consulting on whether to repeal the requirement for farmers to use less than 190 kilograms of nitrogen per hectare per year on the grazed area of their farms.</p>	<p><b>GWRC support aligning reporting dates with the farming calendar.</b> Our farmers would benefit from less onerous/duplicated process and that ties in better with the farming calendar.</p> <p><b>GWRC oppose repealing the requirement for farmers to use less than 190 kilograms of nitrogen per hectare per year on the grazed area of their farms.</b> An input level of 190 kg N/ha/year represents a high nitrogen application rate, though it's acknowledged that some intensive cropping systems may seek to exceed this. Nonetheless, this threshold provides a valuable safeguard against excessive nutrient inputs and the associated risk of nitrogen loss to water. Unless an alternative regulatory mechanism—such as an output-based limit—is introduced, retaining this input cap is a worthwhile measure.</p>
	<b>including mapping requirements for drinking water sources</b>	We are consulting on whether to introduce a new requirement in the NPS-FM for source water risk management areas (SWRMAs) to be mapped.	<p><b>Overall, GWRC support the three-zone concept, but the details need more work. We support the two-stage proposal.</b></p> <p>The three-zone approach could be varied to allow more flexibility with lower population thresholds. However, if the population threshold is set too low, potentially much larger areas of land and activities therein could be affected due to the need for additional SWRMAs. The impact will depend on whether policies and rules are triggered any differently for activities within zones (especially the catch all SWRMA 3). If the population threshold is not set too low, the effects of mapping SWRMAs might not be too big.</p>

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			<p>GW has already mapped some SWRMAs which are in our regional plan – essentially, we have mapped SWRMA 2</p> <p>Mapping itself not really a big deal but implications depend on how SWRMA 3 is defined, how maps are used in a policy/rule framework, and how prescriptive direction for this is via NPS-FM and/or Taumata Arowai.</p> <p>Integrating groundwater and surface water SWRMAs could be a major undertaking. GWRC currently map them separately - but arguably some groundwater SWRMAs should be expanded to recognise intersection at the surface with river reaches. The impact on Councils depends how directive the new requirement is.</p> <p>In the past, GWRC has internally debated whether SWRMAs should be incorporated within the regional plan or be separately appended so they can be updated as new information comes to light. This is especially relevant to groundwater SWRMAs which are dependent on the type of modelling used to produce them and so could change with use of a different model. Regional plans are not easily or quickly updated when new information is available, or a revised model is used – and this could impact the ability to respond to new information on drinking water sources in a timely manner.</p>
<p><b>INFRASTRUCTURE AND DEVELOPMENT</b></p> <p>The proposals in this package have been chosen to better enable infrastructure and development where they are needed and can be developed safely, while appropriately managing effects on people and the environment. The proposals are intended to:</p> <ul style="list-style-type: none"> <li>• improve efficiencies and outcomes by supporting fit-for-purpose infrastructure, coordinated with development that meets the longer-term needs of people, communities and our environment</li> </ul>	<p><b>National Policy Statement for Infrastructure</b></p>	<p>The proposal is for a new National Policy Statement for Infrastructure (NPS-I) to better enable and protect infrastructure, by providing:</p> <ul style="list-style-type: none"> <li>- consistent definitions to support the proposed policies</li> <li>- an objective setting out a range of infrastructure outcomes expected from the resource management system</li> <li>- general policies to better enable and protect infrastructure, while managing its effects on various environments, and recognising and providing for Māori rights and interests</li> <li>- policies on managing the interface between infrastructure and other activities</li> <li>- policies to enable infrastructure while managing its effects on the environment</li> </ul>	<p><b>GWRC broadly supports the intent of the NPS-I, where provisions don't override environmental protections or rights and interests of mana whenua.</b></p> <p>The NPS-I represents a significant shift in national planning priorities, elevating infrastructure provision to a matter of national importance under the RMA. This could accelerate urban regeneration and infrastructure delivery, aligning with long-term regional transport and planning goals. However, it introduces tensions between infrastructure development and environmental protection, particularly for councils like GWRC that hold multiple roles (PTA, WRLC, environmental steward). These trade-offs must be carefully managed to achieve balanced community outcomes.</p> <p>The scope of infrastructure under the NPS-I is broader and more ambiguous than existing definitions (e.g., Regionally Significant Infrastructure in the NRP), now including private facilities and loosely defined “social infrastructure.” This lack of clarity risks overextension and inconsistent application. Policies P1 and P2 require decision-makers to recognise and provide for infrastructure benefits and locational needs, potentially overriding environmental protections. The structured analysis approach (from the 2024 East-West Link decision) will be necessary to balance conflicting directives. Additional mandatory considerations will increase complexity, cost, and resourcing needs for consent processing, with cumulative impacts across national direction.</p> <p>GWRC broadly supports the intent of the NPS-I, where provisions don't override rights and interests of mana whenua. The NPS-I seeks to balance long-term infrastructure benefits with local impacts and community wellbeing. However, the proposal lacks clear problem definition and needs stronger integration with spatial planning reforms under the proposed Planning Act.</p> <p>The policy regarding Māori rights and interests is insufficient. Infrastructure can be developed by, with and for the benefit of mana whenua and Māori. However, it is well documented including within historical accounts of Treaty settlements how various types of infrastructure has been developed without involvement in and to the detriment of mana whenua. The impacts continue with the legacies with existing infrastructure. The policies as drafted don't fulfil the Crown's apologies and commitments to new Tiriti-based relationships, nor the responsibilities to Māori outlined and required within Part 2 of the RMA. The policies to recognise and provide for the role of Māori, is to be done including by ‘taking into account’ their views from engagement, and involving where appropriate’. These should be strengthened.</p> <p>From an emergency management perspective, efficiency-focused reforms may undermine resilience, which requires time, resources, and inclusive decision-making. Critical infrastructure decisions must involve experts in hazards and resilience, and align with national emergency management systems and DPMC's work on critical infrastructure. The NPS-I must recognise its implications across all four Rs: risk reduction, readiness, response, and recovery.</p> <p><b>GWRC will respond to the questions on the NPS - Infrastructure in the online survey</b></p>

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<ul style="list-style-type: none"> <li>enable opportunities and choice for housing to support a range of people and circumstances, including young people and seniors, and to support Māori living on ancestral land in papakāinga</li> <li>support development in areas with a reduced risk to people, communities and property from natural hazards</li> </ul>	National Policy Statement for Renewable Electricity Generation		<p><b>GWRC supports the proposed intent to the NPS for Renewable Energy Generation where provisions don't override rights and interests of mana whenua.</b></p> <p>The Wellington Region is a candidate for further wind and solar power generation. However, large-scale hydro-generation is not supported on the grounds of the irreversible damage to rivers, freshwater ecosystems, and mana whenua values.</p> <p>The policy regarding Māori rights and interests is not sufficient as with the NPS-I. This should be strengthened.</p>
	National Policy Statement on Electricity Transmission	The proposed NPS-EN will include alignment of the policy directions of the NPS-EN and the proposed National Environmental Standards for Electricity Network Activities (NES-ENA).	<p><b>GWRC supports the proposed changes to the NPS and NES Electricity Transmission where provisions don't override rights and interests of mana whenua.</b></p> <p>GWRC supports particularly provisions enabling renewable energy generation and EV charging infrastructure.</p> <p>The provisions to protect Māori rights and interests are not sufficient, as with the NPS-I. This should be strengthened.</p>
	National Environmental Standards for Electricity Transmission Activities	The proposal is to amend the NESETA, to provide more enabling standards and extend its application to include electricity distribution and EV charging infrastructure.	<p><b>GWRC supports the proposed changes to the NPS and NES, particularly provisions enabling renewable energy generation and EV charging infrastructure.</b></p>
	National Environmental Standards for Telecommunication Facilities		<p><b>GWRC supports the proposals to facilitate efficiency in design, and location of towers, poles and cabinets, reducing total footprint for structures.</b></p> <p>There needs to be recognition of the critical dependency on communications infrastructure in emergency situations - which in turn is dependent on power. Additional poles/cabinets/antenna will require sufficient and resilient power supply.</p> <p>Permitting new poles in more zones needs to take into account the access requirements in emergency situations for repairs / installation of generators (if battery backups run out).</p>
	NES for Papakāinga		<p><b>GWRC support the purpose and outcome of this NES but natural hazards must be considered when siting Papakāinga.</b></p> <p>Building papakāinga in areas prone to flooding, erosion, sea-level rise etc would be inappropriate, dangerous, and costly.</p> <p>GWRC support the redevelopment of existing urban areas with the appropriate infrastructure, transport links, and community facilities.</p>
	National Policy Statement for Natural Hazards	<p>The key elements of the proposed NPS-NH are that local authorities must:</p> <ul style="list-style-type: none"> <li>take a risk-based approach to natural hazard risk, including the introduction of a risk matrix that will define significant risk</li> <li>take a proportionate approach to natural hazard risk</li> <li>use best available information in assessing natural hazard risk.</li> </ul>	<p><b>GWRC supports the intent of the NPS-NH and welcomes its potential to provide a more defensible basis for risk-based decisions.</b></p> <p>The NPS-NH introduces a risk-based approach to land use and spatial planning, which will reshape development decisions across the region. Areas previously identified for growth may become unsuitable due to hazard exposure. This approach aligns with GWRC's existing practices—particularly in transport, where climate adaptation and resilience are already embedded in strategic objectives and investment prioritisation (e.g., RLTP 2024 review). <b>The NPS should explicitly include regional planning instruments such as RLTPs, FDSs, and future spatial plans to ensure alignment across planning layers.</b></p> <p>The policy statement also acknowledges the long-term nature of infrastructure, reinforcing the need for 100-year planning horizons. However, it remains unclear whether regional planning authorities or asset owners will be responsible for applying the NPS-NH provisions in infrastructure planning and investment.</p>



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			<p>While the NPS-NH aims to strengthen hazard management, several critical gaps and inconsistencies undermine its effectiveness:</p> <ul style="list-style-type: none"> <li>- Drought is excluded from the hazard list, despite its major implications for drinking water security.</li> <li>- Infrastructure and primary production are omitted from the “activities and environments” scope, which is problematic given their exposure and importance.</li> <li>- The NPS includes no recognition of the role of mana whenua in identification or assessment of natural hazards. The Ministry received feedback from Māori on a policy within its earlier NPS proposal on Natural Hazard Decision-making that can be responded to and incorporated.</li> <li>- The natural environment’s resilience is not adequately addressed, despite its inclusion in national climate risk assessments.</li> <li>- The policy appears permissive, favouring the term “limit” over “avoid,” which may enable continued development in hazardous areas.</li> <li>- The “best available information” requirement lacks clear standards, definitions, or protections for staff and SMEs, raising concerns about legal vulnerability and implementation consistency.</li> </ul> <p>The risk matrix is also misaligned with MfE’s climate risk guidance, focusing on hazard likelihood without adequately addressing consequences. This could result in underestimating high-impact events like earthquakes or tsunamis, and fails to reflect the full complexity of disaster risk, which includes chronic and cascading impacts, social and cultural dimensions, and interdependencies between infrastructure and communities.</p> <p>GWRC supports the intent of the NPS-NH and welcomes its potential to provide a more defensible basis for risk-based decisions. However, successful implementation will require:</p> <ul style="list-style-type: none"> <li>- Clearer guidance on climate scenarios, hazard modelling standards, and definitions of risk levels.</li> <li>- Increased funding to fill data gaps, conduct CCRAAs, and support community engagement.</li> <li>- Access to technical expertise, as many consenting authorities may lack the capability to assess complex hazard risks.</li> <li>- Alignment with emergency management systems, including the CDEM Act and DPMC’s work on critical infrastructure.</li> </ul> <p>From an emergency management and resilience perspective:</p> <ul style="list-style-type: none"> <li>- Efficiency must not come at the cost of resilience—robust, inclusive, and well-resourced planning is essential.</li> <li>- Disaster risk assessment must go beyond traditional matrices to include exposure, vulnerability, and systemic interdependencies.</li> <li>- Infrastructure resilience is foundational - development is only as resilient as the infrastructure it relies on</li> </ul> <p><b>GWRC will respond to the questions on the NPS – Natural hazards in the online survey</b></p>
<p><b>PRIMARY SECTOR</b></p> <p>The proposals include new and amended rules to clarify which activities are proposed to be permitted as of right, and which would need a consent in district or regional plans. The proposals also provide more targeted national</p>	<p><b>NES for Marine Aquaculture</b></p>		<p>The proposed permitted activity for researching new AQ sites and infrastructure should include a condition to notify the Harbour Master that a new structure has been put in the CMA. Would prefer this to be a Controlled activity.</p> <p>7-year consents is a considerable amount of time for a research consent and is more in line with a feasibility study approach. Once a trail is underway, it may provide a soft pathway for consenting a farm.</p>
	<p><b>NES for Commercial Forestry</b></p>	<p>The proposal is for the following key changes to the NES-CF.</p> <ul style="list-style-type: none"> <li>• Repeal regulation 6(4A) which enables councils’ broad discretion to have more stringent rules to control aspects of afforestation.</li> <li>• Amend regulation 69 to require a slash mobilisation risk</li> </ul>	<p><b>GWRC does not support the NES-CF becoming more permissive than it already is.</b></p> <p><b>We do not support the imposition of stricter criteria for regional rules being more stringent than the regulations.</b> S.32 analysis and the Schedule 1 process are sufficient tests to justify regional or catchment specific restrictions to protect significant receiving environments or community-driven protections.</p> <p>‘Severe erosion’ needs to be defined.</p> <p><b>We do not support the requirement for a slash mobilisation risk assessment for all harvesting activities.</b></p>

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policy direction to support resource consent and plan-making processes, with a focus on better enabling the primary sector.		assessment (SMRA) for all forest harvests as part of the existing harvest management plan. • Repeal regulations 10A and 77A (which, respectively, require afforestation and replanting plans)	<b>We oppose the removal of afforestation and replanting plans.</b> These plans are a key opportunity for Councils to work with foresters on appropriate setbacks before planting—rather than relying on post-planting monitoring. The plans allow us to assess location of water bodies, erosion and sediment controls, and the proposal overall to identify the risk of the site and prioritise compliance visits. Afforestation and planting plans provide Councils with oversight and knowledge of the afforestation/replanting occurring in our region, and are often of interest to mana whenua and communities.
	NZ Coastal Policy Statement	The proposed amendments are intended to: • strengthen the language in policy 6 to better enable development of priority activities • recognise that priority activities may have a functional or operational need to be located in the coastal marine area • direct decision-makers to provide for aquaculture activities within aquaculture settlement areas • give more recognition to the cultural and environmental benefits of aquaculture.	<b>GWRC oppose revisions to the New Zealand Coastal Policy Statement.</b>  Strengthening Policy 6 to enable priority activities and coastal development will reduce the robustness of environmental protections, particularly in sensitive coastal areas. Priority activities (e.g. port operations, infrastructure) play an important role, but enabling them should not compromise biodiversity, coastal water quality, or marine ecosystem resilience.  Although the Wellington region does not currently have any aquaculture facilities, coastal electricity generation or resource extraction within the CMA, potential future impacts may be great as the region lends itself to some of these activities that are more tightly regulated under existing policy.  Recommendation: <b>Ensure that any strengthened wording in Policy 6 is balanced by a requirement to avoid adverse effects on significant marine habitats and taonga species and aligns with Policy 11 (Biodiversity) and Policy 13 (Natural Character).</b>  Recognising functional or operational needs in the CMA is appropriate in some cases, especially for port or ferry infrastructure in Wellington Harbour. However, a clear definition of "functional or operational need" is critical to avoid misuse of this clause. Without clear boundaries, this could lead to overdevelopment of coastal margins.  Recommendation: <b>Define "functional need" explicitly to prevent cumulative degradation and retain the requirement to provide a robust alternatives assessment for ecological effects.</b>  Providing for aquaculture in settlement areas is reasonable but needs to be approached cautiously in the Wellington Region, where the marine environment is often high-energy and ecologically sensitive. There are also potential conflicts with recreational use, cultural sites, and landscape values.  Recommendation: <b>Incorporate regional-scale spatial planning to assess the suitability of aquaculture in the CMA.</b> This requires co-design with mana whenua from the outset, recognising their kaitiaki role.  The recognition of cultural and environmental benefits of aquaculture is welcome. Aquaculture can provide sustainable food systems, improve water quality (e.g., mussel filtration), and offer meaningful economic and cultural opportunities for iwi. However, these benefits must be substantiated on a case-by-case basis, as some operations can also result in habitat loss or water column shading.  Recommendation: <b>Require applicants to demonstrate net environmental and cultural benefits and nature-positive aquaculture practices, such as regenerative shellfish farming.</b>  The reduction in the ability for councils to set stronger rules around forestry (NES-CF) is likely to result in considerably more sediment in estuaries, even in the short term.
	NPS Highly Productive Land	The proposal is to amend the NPS-HPL to provide more opportunities for urban development while retaining the	<b>GWRC oppose greenfield development on highly productive land.</b>  Most of the highly productive land in the Wellington region is LUC Class 3. However, this is based on the existing flawed and outdated mapping (from the 1970s).



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		most agriculturally productive land for primary production.	<p>Removing LUC 3 from the definition of highly productive land likely means a much smaller area of land protected for primary production activities (noting the ability for Councils to map land that is not LUC Class 1 or 2 as highly productive if it is considered to be so in the regional context, including LUC Class 3 land).</p> <p>Regarding extending timeframes: this makes little or no difference for the mapping, however the longer timeframe will make a big difference to the amount of consultation we will be able to do.</p> <p>The Wellington RPS and NRP direction on urban development is focussed on intensifying existing urban areas and avoiding unnecessary greenfield development. The proposed changes are consistent with existing RPS direction on productive soils (protecting LUC Class 1 + 2 land from development and reserving its use for primary production activities).</p>
	Multiple instruments for quarrying and mining provisions	The proposal to amend the NPSIB, NPS-FM & NES-F:	<p><b>GWRC broadly supports consistent terminology across instruments, but oppose provisions that override environmental protections and the rights and interests of mana whenua.</b></p> <p>Consistent terminology across instruments is effective and efficient, and beneficial for everyone involved.</p> <p>Regional benefits is a low threshold. It is likely that all quarries will argue that they have regional benefits.</p>
	Stock exclusion regulations	The proposal to amend regulation 17 of the Stock Exclusion Regulations includes amending the requirement that all stock must be excluded from any natural wetlands that support a population of threatened species, so that it would not apply to non-intensively grazed beef cattle and deer.	<p><b>GWRC support limited stock access to wetlands where site-specific assessments determine it will be beneficial to the wetland.</b></p> <p><u>Some</u> wetlands <u>may</u> benefit from low level grazing to manage weeds. However, these wetlands would certainly be in the minority and evidence is mostly anecdotal. We support the ability to make site specific management plans and monitor effectiveness rather than allow broad changes to livestock access.</p> <p>We support the ability to look at each situation case by case to manage effects for wetlands where the full exclusion of all livestock is difficult or unfeasible. <u>Some</u> low level grazing in <u>some</u> wetlands may be considered to have less than minor effects – but the assessment is always site-specific.</p>