

# SUBMISSION

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To: Wellington Regional Council  
PO Box 11646  
Wellington 6011

Submission on: **Proposed Change 1 to the Regional Policy Statement for Wellington Region**

Pursuant to: **Section 80A and Part 4 of Schedule 1 of the Resource Management Act 1991, for those parts that form part of a Freshwater Planning Instrument; and**  
  
**Clause 6 of Schedule 1 of the Resource Management Act 1991, for those parts that are not part of a Freshwater Planning Instrument**

Date: 14 October 2022

Submission by: Wairarapa Federated Farmers  
**David Hayes**  
WAIRARAPA PROVINCIAL PRESIDENT  
Federated Farmers of New Zealand

Address for service: **Elizabeth McGruddy**  
SENIOR POLICY ADVISOR  
Federated Farmers of New Zealand  
PO Box 715, Wellington 6140  
P 0800 327 646  
E [emcgruddy@fedfarm.org.nz](mailto:emcgruddy@fedfarm.org.nz)

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Wairarapa Federated Farmers welcome this chance to submit on Proposed Change 1

We acknowledge any submissions that have been lodged by individual members.

Federated Farmers seek the relief on provisions specified in this submission and the attached table, for the reasons provided in relation to each submission point

Federated Farmers wish to be heard in support of this submission, and request consideration of convening some hearings in the Wairarapa.

Federated Farmers would consider being heard in conjunction with any other similar submissions.

Federated Farmers could not gain advantage in trade competition through this submission.

## OVERVIEW

1. Wairarapa Federated Farmers (FFNZ) welcome this opportunity to submit on Regional Policy Statement (RPS) Proposed Change One.
2. The scope of RPS Change One encompasses urban development, natural hazards, water, biodiversity and climate change. Of these matters, arguably climate change is the pre-eminent topic.
3. Federated Farmers takes a strong interest in climate change policy, both emissions mitigation and climate adaptation. We have a long history of engaging in climate policy in New Zealand and internationally. We are also actively involved in the climate change workstream of the World Farmers Organisation (WFO).
4. New Zealand farmers are very aware of the risks of climate change to their businesses, especially compared to other sectors and industries. As a member of the 'Global North', New Zealand is almost unique in both generating most of its electricity from renewable (predominately hydro) sources and being dependent upon an efficient (predominately livestock-based) agricultural sector for much of its export revenue.
5. Federated Farmers is committed to the New Zealand agricultural sector achieving a 2050 goal of becoming warming-neutral, consistent with the 2015 Paris Agreement; and to ensuring domestic climate change policies are consistent with the Paris Agreement, including by "Recognizing the fundamental priority of safeguarding food security and ending hunger, and the particular vulnerabilities of food production systems to the adverse impacts of climate change".
6. Our farmers are amongst the most efficient producers in the world; and are playing their part in transitioning to a low emissions economy alongside the rest of New Zealand and supporting delivery of the Zero Carbon Act. We accept the need to further reduce the greenhouse gas footprint from farming. We support the need to reduce gross long-lived gases (carbon dioxide and nitrous oxide emissions) to net zero by 2050. We support the need to reduce biogenic methane so that its effect on global temperatures is warming neutral.
7. Federated Farmers support farmer climate resilience and innovation within the sector and with others to reduce emissions. Good plans and regulations should foster engagement and innovation and be easy to comply with. The climate change proposals in RPS Change One do not do this and risk stifling the very innovation and changes needed to have a vibrant region with farmers meeting their environmental obligations and contributing to a resilient economy and society.

## GENERAL COMMENTS

8. We understand the driver for notification of RPS Change One was the National Policy Statement for Urban Development (NPS-UD); and that a full review of the RPS is scheduled in 2024 to give full effect to the National Policy Statement for Freshwater Management (NPS-FM); and to incorporate any other directions from central government, eg, in respect of biodiversity and climate change which are under development at the national level.
9. In this context, we record concern that RPS Change One includes climate change provisions which have been notified in advance of amendments to the RMA which do not come into effect until 30 November 2022; and that it includes biodiversity provisions which seek to pre-empt the upcoming National Policy Statement for Indigenous Biodiversity (NPS-IB).
10. The proposed changes are not trivial: instead, they attempt to ‘reset’ the direction of the region for the coming decade and out to 2050. In this context we record concern that RPS Change One was subject only to the minimum statutory consultation and that Federated Farmers was not consulted prior to notification.
11. Proposals of this magnitude should be accompanied by very robust s32 evaluation of the efficiency and effectiveness of provisions. Instead, there is no evaluation of the option of deferring changes to the full review of the RPS scheduled in 2024.
12. Council propose regional climate change targets which are not referenced to the Zero Carbon Act and which are intended to be significantly more challenging. Again, ambition of this magnitude must be matched by very robust cost/benefit analysis: instead, Council rely only on a brief internal memorandum prepared as late as August, ie, just prior to notification.
13. The Zero Carbon Act is intended to provide clear and stable climate change settings. Against this clear imperative, Council instead seek to unilaterally de-stabilise both the national climate change targets and the mechanisms for achieving them in this region.
14. The proposed regional targets are not accompanied by any coherent and costed strategy for achieving them. Instead, it appears that Council seek to use this process to “lock in” targets in the Regional Policy Statement, and reveal the plan for achieving them in the Regional Plan changes scheduled for 2023 and 2024.
15. On our reading, the intention and effect of Council proposals is they will impact most directly on the agricultural sector, and that the Wairarapa will be re-invented as a carbon offset for Wellington. The ramifications for the primary production sector and the wider regional economy are not discussed. Instead, any economic analysis is restricted to a hastily compiled “indicative” memorandum which purports to find benefits and refers to “some negative costs” only in brackets.
16. RPS Change One includes provisions which have recently been the subject of protracted mediation through the pNRP process. Notwithstanding those mediated agreements,

Council seek to re-litigate key provisions in RPS Change One, including provisions relating to earthworks and vegetation, and in respect of biodiversity offsets. Federated Farmers record concern that this makes a mockery of good faith mediation within statutory processes, and further de-stabilises the business and investment certainty which should be attendant on clear and stable regulatory settings.

17. RPS Change One includes provisions which are marked for the new “fast-track” freshwater planning process under which appeal rights are significantly restricted. Recognising the import of this change, provisions should only be assigned to that fast-track when they are clearly freshwater provisions for the purpose of freshwater management. Instead, two-thirds of provisions are marked for the freshwater fast-track, including provisions from the climate change chapter, the biodiversity chapter, and various other topics. We believe the effect is contrary to Parliament’s intention, and to the safeguards for community involvement which are provided for in the RMA.
18. RPS Change One includes provisions wherein Council propose that iwi be ‘partners’ in the conduct of Regional Council business, and that other groups across the community be engaged with in another capacity. Beyond directions already provided for in statute, Federated Farmers do not consider that any groups of people should be given different status in the conduct of Council business.
19. In summary, Federated Farmers record very strong concern that RPS Change One is an ill-conceived attempt to rush through changes that do not meet a reasonable standard of professional public policy practice. At worst, we are concerned that aspects of RPS Change One may go beyond the statutory framework they rely on.

## FEDERATED FARMERS RELIEF

20. For all the reasons set out above – and expanded on in the following table – Federated Farmers do not agree that RPS Change One should include provisions relating to climate change, biodiversity and water.
21. The scope of RPS Change One should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development.
22. Any other matters should be subject to proper review in the scheduled full review of the Regional Policy Statement in 2024; and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024.

## GOING FORWARD

23. Going forward, Federated Farmers urge Council to commit to a much more transparent and collaborative approach to inform the upcoming reviews of the Regional Policy Statement and Natural Resources Plan.
24. We agree with Council's advice to the Climate Change Commission in respect of converting crisis to opportunity: that the opportunity lies in activating shared cross-government and sector responses that don't disadvantage our economic resiliency, and which enable commercial leadership in climate solutions.
25. Federated Farmers acknowledge and value our long history of partnerships with Council in this region. We seek – alongside our primary sector colleagues and with Council – to capitalise on that history of partnerships to sustain and accelerate momentum towards our shared aspirations of delivering environmental improvements alongside a thriving bio-economy.

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Federated Farmers is a not-for-profit primary sector policy and advocacy organisation and represents many farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

This submission is representative of member views and reflects the fact that resource management and local government decisions impact on our member's daily lives as farmers and members of local communities.

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	Name	Provision as notified	Relief sought	Reasons for relief
1	<b>Proposed amendments to Chapter 3: resource management issues, objectives</b>			
1.2	Whole chapter	<u>All proposed amendments</u>	<b>That all proposed amendments to Chapter 3 be deleted</b>	The over-arching resource management issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024 <sup>1</sup> .
1.3	Identification of freshwater (FW) planning instruments 	Proposed provisions with FW icon	Delete FW icons	We do not agree that the proposed amendments to Chapter 3 should be treated as “freshwater” instruments: instead their intention and application is as ‘integrative’ provisions.  As set out in a recent High Court decision: “Parts of a proposed regional policy statement cannot be treated as parts of a freshwater planning instrument simply because there is some connection to freshwater through the concepts of Te Mana o Te Wai, ki uta ki tai or the integrated management of natural and physical resources. To hold otherwise would be contrary to Parliament’s intention” <sup>2</sup> .
1.4	Three new over-arching resource management issues	<u>The overarching resource management issues for the Wellington Region are:</u>  1. <u>Adverse impacts on natural environments and communities</u>  <u>Inappropriate and poorly managed use and development of the environment, including both urban and rural activities, have damaged and continue to impact the natural environment, increase greenhouse gas emissions, destroying ecosystems, degrading water, adversely impacting the relationship between mana whenua and the taiao, and leaving</u>	<b>That the three new over-arching resource management issues be deleted.</b>  Alternatively, insert an overarching resource management issue to the following or similar effect to emphasise strengthening the connections between people and place, hapu and community, matauranga and data, putaiao and innovation:  Over-arching Issue: sustain and accelerate the multi-agency delivery platforms for empowering catchment communities for collective action and mutual support to	Defer to the full review of the RPS in 2024.  In respect of Issue One, that 2024 review should be informed by careful analysis and interpretation of up-to-date regional state and trend data - including from the expanding network of finer-scale catchment monitoring and hapu/marae indicators - and including the findings from NRP methods directing Council investigation of environmental issues.  In respect of Issue Two, we note Councils statement that the “primary driver for undertaking RPS Change One in 2022 is the National Policy Statement for Urban Development (NPS-UD). <sup>3</sup> In that context, Issue 2 in respect of housing and infrastructure capacity is

<sup>1</sup> Council 26 May 2022 order paper – RPS Change One draft provisions, Attachment 1 to Report 22.209, page 1

<sup>2</sup> CIV-2021-412-000089 [2022] NZHC 1777: Otago Regional Council v Royal Forest and Bird Protection Society

<sup>3</sup> Council 18 August 2022 order paper – public notification of Change One to the Regional Policy Statement

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		<p><u>communities and nature increasingly exposed to the impacts of climate change.</u></p> <p>2. <u>Increasing pressure on housing and infrastructure capacity</u></p> <p><u>Population growth is putting pressure on housing and infrastructure capacity. To meet the needs of current and future populations, development will place additional pressure on the natural and built environments.</u></p> <p>3. <u>Lack of mana whenua / tangata whenua involvement in decision making</u></p> <p><u>Mana whenua / tangata whenua values, Te Ao Māori and mātauranga Māori have not been given sufficient weight in decision-making, including from governance level through to the implementation. As a result, mana whenua / tangata whenua values have not been adequately provided for in resource management, causing disconnection between mana whenua / tangata whenua and the environment.</u></p>	<p>address the twin challenges of improving environmental outcomes and sustaining thriving economies and connected communities.</p> <p>And/or insert a second over-arching issue to the following or similar effect:</p> <p>Over-arching Issue: accelerate the multi-agency delivery platforms to address the looming water supply-demand gap, ie, giving back to the wai, while sustaining the people.</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>directly relevant to RPS Change One but would more properly be considered in Chapter 3.9 Regional Form, Design and Function.</p> <p>The s32 report further clarifies (para 67) that “the focus of this RPS change is on the interface between urban development and freshwater”, referencing loss of streams to urban subdivision, wastewater overflows and stormwater quality. In this context, Issue 1 would more properly be considered in Chapter 3.9, linked to proposed Issue B (inappropriate development).</p> <p>In respect of Issue Three, we question whether “lack of’ involvement is a reasonable representation of iwi involvement in Council decision-making in recent years, and suggest Council provide documentation of the extent and level of current engagement.</p> <p>Beyond these three proposed “new” issues, we note that the existing Chapter 3 Introduction identifies that providing for the community’s needs while sustaining ecosystems in a healthy state is “one of our largest challenges”.</p> <p>It goes on to state that decisions made about the management of resources “are more effective and lasting if they reflect choices made by the community”, and that “a whole of catchment approach is particularly useful”.</p> <p>This theme is included in NZ’s First Emissions Reduction Plan, ie, Action 3.5.3: “Support localised and community solutions: the Government is looking to empower communities and Maori to champion local actions specific to their situation and to share ideas that work’.<sup>4</sup></p>

<sup>4</sup> Towards a productive, sustainable and inclusive economy: Aotearoa NZs First Emissions Reduction Plan

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				<p>This theme has also been a focus for the Parliamentary Commissioner for the Environment, for example: “Getting beyond laudable vision statements will require engagement with real communities on the ground...integrate all we know about environmental processes at landscape scale with bottom-up grass-roots knowledge. It would focus on giving those who live there the incentives and the means to address environmental and socio-economic concerns in parallel”.<sup>5</sup></p> <p>The Te Mana o Te Wai Statements from Wairarapa Iwi express similar concepts, for example, creating safe spaces for whanau/hapu/community to share and collaborate within; recruiting whanau/hapu/community for monitoring and analysis of FMU and sub-FMU data and matauranga; collaboration of matauranga, putaiao and technology to create innovative solutions.</p> <p>In similar vein, a recent Manaaki Whenua report assessed climate change implications for maori, identifying significant gaps in knowledge, but concluding that: “Notwithstanding these gaps and uncertainties, social-cultural networks and conventions that promote collective action and mutual support are central features of many maori communities”.<sup>6</sup> These principles of collective action and mutual support are also central features of many rural communities.</p> <p>Enabling catchment communities is a key theme in the three Whaitua Implementation Plans (WIPs) completed to date. For example, Ruamahanga WIP Recommendation 5 (empowering communities to</p>

<sup>5</sup> PCE, 2019, Farms, Forests and Fossil Fuels

<sup>6</sup> Manaaki Whenua Landcare Research, 2021, He huringa ahuarangi, he huringa ao; a changing climate, a changing world



	Name	Provision as notified	Relief sought	Reasons for relief
				<p>recommend and implement management options in their sub-catchment); Porirua WIP Recommendation 17 (support catchment groups to identify and implement optimal local solutions); Te Whanganui-o-Tara WIP Recommendation 10 (GW, mana whenua and TAs establish services to support new and existing catchment groups)</p> <p>Across the region, significant progress has already been made on multi-agency platforms to support catchment communities over these last few years; and the large and growing network of catchment groups in the Wairarapa - ably supported by their umbrella organisation (WaiP2K) and Council (land management and environment science staff) - is witness to the power of this approach.</p> <p>Most of the catchment groups are in the relatively early stages of gathering catchment data and developing catchment action plans; and the key ongoing issue is to sustain and accelerate that momentum, and to continue growing the network. Most catchment groups are taking a holistic approach in developing their visions and action plans, considering climate change <u>and</u> biodiversity <u>and</u> water quality <u>and</u> water quantity <u>and</u> biodiversity <u>and</u> thriving local communities.</p> <p>In the context of all the above, our alternative relief proposes crafting these key themes into a new over-arching issue which speaks to the importance of people and strengthening the connections between people and place.</p> <p>We also propose a second over-arching issue picking up on the integrated approach which informs many of the catchment groups. We suggest that in the decade since the RPS was made operative, the key issue that has come to the forefront is climate</p>

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				<p>change, eg: “The climate change challenge is the single dominant and integrating consideration in resilience for the next 20-30 years”<sup>7</sup>.</p> <p>Each of the chapters in RPS Change One makes reference to the impacts of climate change, be it water, biodiversity, natural hazards or infrastructure. Of that list, arguably: “The climate’s number one victim is always water”<sup>8</sup>.</p> <p>The Ruamahanga WIP recognised the challenge, presenting recommendations to (inter alia):</p> <ul style="list-style-type: none"> <li>• Leave more water in the rivers; and</li> <li>• Appreciating the implications for human communities and economies, recommending that Council investigate integrated solutions to water reliability – “these should include integrating storage, harvesting, attenuation and managed aquifer recharge, and facilitate pilot projects to prove feasibility” (Recommendation 74)</li> </ul> <p>In 2021, the Wairarapa Water Resilience Strategy picked up the baton, recommending a portfolio of “nature-based” and constructed storage solutions. The Strategy emphasises ‘whole of catchment’ thinking: “Whole of catchment thinking ... is fundamental to this strategy. As we consider blending natural and built responses to climate change and enlist the support of surrounding communities, then the catchment is the ideal unit of management...part of understanding a catchment is understanding its hydrological cycle. We may need to be innovative – trial and potentially use technologies</p>

<sup>7</sup> [https://www.growwairarapa.nz/files/ugd/cc95da\\_fdb607c16f3f46b0bb93e96cc022d582.pdf](https://www.growwairarapa.nz/files/ugd/cc95da_fdb607c16f3f46b0bb93e96cc022d582.pdf)

<sup>8</sup> [https://www.growwairarapa.nz/files/ugd/cc95da\\_fdb607c16f3f46b0bb93e96cc022d582.pdf](https://www.growwairarapa.nz/files/ugd/cc95da_fdb607c16f3f46b0bb93e96cc022d582.pdf)

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				<p>or concepts that have yet to be proven at catchment scale”.</p> <p>The Statements of Expression of Te Mana o Te Wai from Wairarapa Iwi eloquently describe “giving back to the wai, while we utilise her waters to sustain our people”. The statements express a desire to “empower people to innovate and create our own solutions”, and to “work collaboratively with our wider communities”.</p> <p>We seek that RPS Change One elevate the challenge of “giving back to the wai, while we utilise her waters to sustain our people” to an overarching issue.</p> <p>At a practical level, Federated Farmers is aware that the twin drivers of climate change and regulatory settings are resulting in severe implications for the availability and reliability of water for both existing and new water users across town and country. Most of the region is deemed to be “fully allocated” with acute implications for our growing population, for transitioning to horticultural crops (which demand high reliability) and presenting huge impediments to sustaining or developing productivity on “rainfed” land (which is most of the land in the region), ie, it is not currently irrigated but is exposed to (increasingly unreliable) rainfall patterns. We are acutely aware that this includes maori land.</p> <p>We are equally aware of the investments that existing water users have made in sourcing and developing water supply infrastructure and in improving their efficiency of use; and the implications for these farming families – and the wider regional economy - of unreliable and uncertain access to water to sustain their enterprises and livelihoods.</p>

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				We submit that this “supply-demand” gap has come into full focus in the decade since the RPS was made operative; and that the import is such across all domains that it should be recorded as an over-arching issue.
1.5	A new over-arching objective	<p><u>The overarching resource management objective for the Wellington Region is:</u>  <b>Objective A:</b> <u>Integrated management of the region’s natural and built environments is guided by Te Ao Māori and:</u></p> <p>(a) <u>incorporates mātauranga Māori; and</u></p> <p>(b) <u>recognises ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and</u></p> <p>(c) <u>protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and</u></p> <p>(d) <u>recognises the dependence of humans on a healthy natural environment; and</u></p> <p>(e) <u>recognises the role of both natural and physical resources in providing for the characteristics and qualities of well-functioning urban environments; and</u></p> <p>(f) <u>responds effectively to the current and future pressures of climate change, population growth and development.</u></p>	<p><b>That Objective A be deleted</b></p> <p>Alternatively, insert an overarching objective to the following or similar effect to emphasise strengthening the connections between people and place, hapu and community, matauranga and data, putaiao and innovation:</p> <p><b>Objective A:</b> catchment communities are enabled and empowered to collaborate in working together to support the mana of the land and the water and the people who live and work within.</p> <p>And/or a new objective to the following or similar effect to address the looming water supply-demand gap:</p> <p><b>Objective B:</b> catchment communities are enabled and empowered to develop and prototype weaving together nature-based and built solutions for respecting and sharing water.</p> <p>Consequential to these new objectives, a supporting portfolio of policies and methods could include:</p>	<p>As set out above for over-arching issues.</p> <p>We propose two new over-arching objectives and indicate key supporting elements which could consequentially be developed as policies and/or methods, in part to help inform the upcoming changes to the NRP in 2023 and 2024.</p> <p>Most of these elements are touched on or implicit in various parts of RPS Change One but they are fragmented across chapters and mostly expressed as higher-level generalities.</p> <p>Our concern (taking a cue from the PCE as noted above) is to bring the “laudable vision statements” down to the ground. We want to get stuck in with real data and real people in real catchments.</p>

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			<ul style="list-style-type: none"> <li>• Understanding the resource, eg, utilising Skytem, Groundtem and other methods to improve our understanding of groundwater hydrology and groundwater/surface water connections</li> <li>• Expanding monitoring (low-flows, flood-flows, water quality, stream life) and making results available to catchment communities in real time</li> <li>• Quantifying and analysing actual use of water and identifying any seasonal patterns across sectors, and any geographic patterns or pinchpoints</li> <li>• Documenting un-met or emerging demand for water (eg, on rainfed land, undeveloped maori land, expanding urban centres) and identifying any seasonal or geographic patterns</li> <li>• Quantify the supply-demand gap by whitua, and identify priority catchments</li> <li>• Initiate pilot projects in priority catchments to install and monitor a network of nature-based and built solutions including consideration of integrative opportunities for enhancing</li> </ul>	

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			<p>biodiversity and incorporating renewable energy;</p> <ul style="list-style-type: none"><li>• document and report on costs/performance/barriers/enablers</li><li>• Clear any roadblocks to increase the scale and pace of uptake</li></ul>	

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2	<b>Proposed insertion of Chapter 3.1A: Climate Change</b>			
2.1	Whole chapter	<u>All proposed amendments</u>	<b>That the proposed insertion of Chapter 3.1A be rejected</b>	Climate change issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024.
2.2	Identification of freshwater (FW) planning instruments	Proposed provisions with FW icon	Delete FW icons	<p>We do not agree that any of the proposed climate change provisions are freshwater instruments.</p> <p>As set out in a recent High Court decision:  “Consistent with the purpose of the Amendment Act and participatory rights under the RMA, in applying s80A, the starting point must be that all of the proposed regional policy statement will be subject to the normal planning process as set out in pt 1 of sch 1 of the RMA. It will only be those parts of the proposed regional policy statement that directly relate to freshwater management, in the manner just discussed, that can be part of a freshwater planning instrument”<sup>9</sup></p> <p>The Regulatory Impact Statement (RIS) addressing the new planning process for freshwater clarified that the amendment was “specifically aimed to assist delivery of the NPS-FM”. The RIS canvassed an alternative approach (“to provide councils with a choice of when the process could be used. It could be optional, for example, for implementing any piece of national direction, or an issue the council considers particularly complex or contentious”) but concluded: “the particular objective that this proposal has is timely implementation of the NPS-FM”<sup>10</sup></p>

<sup>9</sup> CIV-2021-412-000089 [2022] NZHC 1777: Otago Regional Council v Royal Forest and Bird Protection Society

<sup>10</sup> <https://environment.govt.nz/assets/Publications/impact-statement-a-new-planning-process-for-freshwater-updated.pdf>

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2.3	<p><u>Chapter Introduction</u> <u>Introductory text and key issues</u></p>	<p><u>Long term weather records show that seven of the past nine years have been amongst New Zealand’s warmest on record, with 2021 and 2016 being the two hottest recorded years. In the Wellington region, we have one of the highest rates of sea level rise in New Zealand due to the effects of global sea level rise, compounded by a regional trend of tectonic subsidence.</u></p> <p><u>Predictions for climate change impacts in the Wellington Region<sup>1</sup> significant impacts by 2090 if global emissions are not significantly reduced. The annual regional temperatures, for instance, could increase by up to 3°C. The key highlights from the report include:</u></p> <ul style="list-style-type: none"> <li>• <u>Wellington and Wairarapa will experience a significant increase in hot days</u></li> <li>• <u>Frost occurrence, including in the high elevation areas, is projected to significantly decrease</u></li> <li>• <u>Spring rainfall will reduce by up to 15 percent in eastern areas</u></li> <li>• <u>Up to 15 percent more winter rainfall could be experienced along the west coast</u></li> <li>• <u>The risk of drought will increase in the Wairarapa</u></li> <li>• <u>More extreme rainfall events</u></li> </ul>	<p><b>That the introduction be deleted.</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Council have notified these provisions in advance of the repeal of the statutory bar in the RMA in respect of local authority roles in climate change matters. Federated Farmers sought clarification but Council declined to clarify any advice received in respect of notification prior to November 2022, instead citing “legal privilege”<sup>11</sup>.</p> <p>Similarly, the s32 Report states (page 253) that: “Legal advice is that both district and regional councils must have regard to the National Emissions Reduction Plan’. Federated Farmers requested that advice: Council refused, citing legal privilege</p> <p>Federated Farmers record concern that the statutory basis for notification could and should be clearly set out; and that in the absence of evidence to the contrary, the proposed insertion of new chapter 3.1A be rejected.</p> <p>It is our understanding that the Minister for the Environment sees national direction as critical to ensuring successful implementation of climate change policies consequent to repeal of the statutory bar<sup>12</sup>. Against the risk of “ad hoc” decision making by councils, it is our understanding that the date was set to provide time for the Ministry for the Environment to provide advice and direction to Councils to ensure the regional contribution to climate change mitigation is focussed where it is most valuable and appropriate.<sup>13</sup></p> <p>Local Government NZ endorse the need for national direction – including a collaborative approach to set regional emissions reduction targets - so that local</p>

<sup>11</sup> Email correspondence 9 September 2022

<sup>12</sup> Office of the Minister for the Environment to Chair, Economic Development Committee: Resource Management Amendment Bill – Climate Change Commencement Dates

<sup>13</sup> Impact Summary: linking the Zero Carbon Act 2019 with the Resource Management Act 1991



	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>Some changes are occurring faster than previously expected, such as sea level rise and ocean warming, leading to more frequent and energetic storms causing an increase in flooding, coastal erosion and slips in many parts of the region.</u></p> <p><u>While historical emissions mean that we are already locked into continued global warming until at least mid-century, and longer for sea-level rise, there is still opportunity to avoid the worst impacts of climate change if we act urgently across all sectors to make signification reductions in global greenhouse gas emissions.</u></p> <p><u>In 2021 He Pou a Rangi the Climate Change Commission issued a call to all New Zealanders “to take climate action today, not the day after tomorrow”, concluding that New Zealand needs to be proactive and courageous as it tackles the challenges the country will face in the years ahead. All levels of central and local government must come to the table with strong climate plans to get us on the right track, concluding that bold climate action is possible when we work together.<sup>2</sup></u></p> <p><u>While this will require bold and decisive action, there is a need to act carefully, recognising that the costs of change will not be felt equally across our</u></p>		<p>authorities and communities can move at pace in a unified direction; “It is unlikely this will happen cohesively without clearer direction”.<sup>14</sup></p> <p>In early 2023 Government intend to consult on a Climate Adaptation Act: we note Councils assessment that this gives time to make submissions, including “building a position and messaging on the most effective roles and responsibilities of local and central government”.<sup>15</sup></p> <p>Further to that, it is our understanding that Council is leading a work programme at the regional level to develop a Regional Emissions Reduction Strategy. This strategy is intended to identify priorities – and timing/roles/costs - for the region and is scheduled for completion in June 2023.</p> <p>In addition, Council are scoping a project to develop a “Low Carbon Economy Transition Report”, intended to describe a practical vision and steps needed in key sectors to create a low carbon economy.<sup>16</sup></p> <p>At the same time, the primary sector is working alongside central government to agree the shape of a pricing mechanism, alongside a range of other industry and central government initiatives to research and support uptake of emission reduction technologies, and to research and provide appropriate recognition for on-farm carbon sequestration.</p> <p>In respect of the issues set out in this introduction, we note that Issue One does not reference the Zero Carbon Act including the split gas approach to the</p>

<sup>14</sup> LGNZ Submission – Aotearoa First Emissions Reduction Plan, June 2022

<sup>15</sup> GWRC Report 21.349 to Climate Committee, 17 August 2021

<sup>16</sup> Climate Committee 19 October 2021 order paper

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>communities and that provision needs to be made for an equitable transition.</u></p> <p><u>In 2019, Greater Wellington Regional Council declared a climate emergency, pledging to become carbon neutral by 2030 and to take a leadership role to develop a Regional Climate Emergency Response Programme, working collaboratively with iwi, key institutions and agencies to reduce greenhouse gas emissions and prepare for the unavoidable effects of climate change, supporting international and central government targets for emissions reductions and adaptation planning.</u></p> <p><u>The key areas of action required to address climate change are to:</u></p> <ol style="list-style-type: none"> <li><u>1. Reduce gross greenhouse gas emissions. This includes transitioning as rapidly as possible from fossil fuels to renewable energy and recognising that methane reductions offer a significant opportunity for global cooling in the short-term.</u></li> <li><u>2. Increase greenhouse gas sinks through carbon sequestration, while recognising that this is only a short-term solution, and that the focus must be on reducing gross GHG emissions.</u></li> </ol>		<p>national targets; and that the regional inventory is not distinguished as being either carbon dioxide or biogenic methane.</p> <p>Issue Two does not reference Council advice to MfE, ie, that current understanding of how our indigenous ecosystems and species will respond to climate change is very limited<sup>17</sup></p> <p>Issue 4 does not reference Climate Change Commission advice regarding the limits to the extent that climate change policies can address broader issues around cost of living, nor that Government intends to develop an Equitable Transitions Strategy<sup>18</sup></p> <p>For all these reasons above, Federated Farmers submit that Chapter 3.1A be deleted in its entirety. Instead, the full review of the RPS scheduled in 2024 will be the appropriate time to consider regional climate change provisions, informed by the national and regional workstreams outlined above.</p>

<sup>17</sup> GWRC submission to MfE on the Emissions Reduction Plan discussion document, 23 November 2021

<sup>18</sup> Climate Change Commission, July 2022, Advice on NZ ETS unit limits and price control settings

	Name	Provision as notified	Relief sought	Reasons for relief
		<p>3. <u>Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.</u></p> <p><u>The causes of climate change need to be addressed by internationally coordinated action, but our success depends on responses at national, local and individual levels.</u></p> <p><u>The regionally significant issues, and the issues of significance to the Wellington region's iwi authorities for climate change are:</u></p> <p>1. <u>Greenhouse gas emissions must be reduced significantly, immediately and rapidly</u></p> <p><u>Immediate, rapid, and large-scale reductions in greenhouse gas emissions are required to limit global warming to 1.5°C, the threshold to avoid significant impacts on the natural environment, the health and well-being of our communities, and our economy. Extreme weather events and sea level rise are already impacting our region, including on biodiversity, water quality and availability, and increasing the</u></p>		

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>occurrence and severity of natural hazards. Historical emissions mean that we are already locked into continued warming until at least mid-century, but there is still an opportunity to avoid the worst impacts if global net anthropogenic CO2 emissions are reduced by at least 50 percent from 2019 levels by 2030, and carbon neutrality is achieved by 2050. In the Wellington Region, the main sources of greenhouse gas emissions are transport (39 percent total load in 2018- 19), agriculture (34 percent), and stationary energy (18 percent).</u></p> <p><u>2. Climate change and the decline of ecosystem health and biodiversity are inseparably intertwined</u></p> <p><u>Climate change is placing significant additional pressure on species, habitats, ecosystems, and ecosystem processes, especially those that are already threatened or degraded, further reducing their resilience, and threatening their ability to persist. This, in turn, reduces the health of natural ecosystems, affecting their ability to deliver the range of ecosystem services, such as carbon sequestration, natural hazard mitigation, erosion prevention, and the provision of food and amenity, that support our lives and livelihoods and enable mana whenua to exercise their way of being in the Te Ao Tūroa, the natural world.</u></p>		

	Name	Provision as notified	Relief sought	Reasons for relief
		<p data-bbox="577 210 1016 303">3. <u>The risks associated with natural hazards are exacerbated by climate change</u></p> <p data-bbox="577 341 1025 794">The hazard exposure of our <u>communities, land, infrastructure, food (including mahinga kai), and water security is increasing because of climate change impacts on a range of natural hazards. Traditional approaches to development that have not fully considered the impacts on natural systems, and our over-reliance on hard engineered protection works, which will inevitably become overwhelmed and uneconomic to sustain, will ultimately increase the risk to communities and the environment.</u></p> <p data-bbox="577 833 1003 893">4. <u>The impacts of climate change will exacerbate existing inequities</u></p> <p data-bbox="577 932 1025 1184">The impacts and costs of responding to <u>climate change will not be felt equitably, especially for Māori. Some communities have no, or only limited, resources to enable mitigation and adaptation and will therefore bear a greater burden than others, with future generations bearing the full impact.</u></p> <p data-bbox="577 1222 1003 1315">5. <u>Climate change threatens tangible and spiritual components of Māori well-being</u></p> <p data-bbox="577 1353 1003 1471">Climate change threatens both the <u>tangible and spiritual components of Māori well-being, including Te Mana o Te Wai and Te Rito o Te Harakeke,</u></p>		

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>mahinga kai, and taonga species, and the well-being of future generations. Significant sites for Māori, such as marae, wāhi tapu and urupā, are particularly vulnerable as they are frequently located alongside the coast and fresh waterbodies.</u></p> <p>6. <u>Social inertia and competing interests need to be overcome to successfully address climate change</u></p> <p><u>Many people and businesses lack an understanding of the connection between their actions, greenhouse gas emissions and climate change and the ways that it will impact their lives. In turn, this detracts from our ability to conceive of the changes we can make to help the transition to a low-emissions and climate-resilient future. Social inertia and competing interests are the biggest issues to overcome to address climate change</u></p>		
2.4	<u>Insert new Table 1A</u>	All provisions in Table 1A	<b>Delete, or alternatively, amend Objectives in Table 1A as per relevant relief sought in relation to submissions on Objectives set out below ; amend or delete reference to Policies in Table 1A as per relief sought in relation to submission on Policies set out below; and make consequential amendments to related methods</b>	Defer to the full review of the RPS in 2024.

	Name	Provision as notified	Relief sought	Reasons for relief
2.5	<u>Objective CC.1</u>	By 2050, the Wellington Region is a <u>low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</u> <u>(a) sustainable air, land, freshwater, and coastal management,</u> <u>(b) well-functioning urban environments and rural areas,</u> <u>and</u> <u>(c) well-planned infrastructure.</u>	<b>That Objective CC.1 be deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to the full review of the RPS in 2024 for the reasons set out above.
2.6	<u>Objective CC.2</u>	<u>The costs and benefits of transitioning to a low-emission and climate-resilient region are shared fairly to achieve social, cultural, and economic well-being across our communities.</u>	<b>That Objective CC.2 be deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	We note the Climate Change Commission set out preconditions for an equitable transition strategy, ie, that it must be well-paced, well-planned, well-signalled and co-designed. <sup>19</sup> These preconditions have not been met in the case of the proposals advanced in RPS Change One. To the contrary, the s32 report makes clear that the process was rushed and consultation prior to notification was restricted to the statutory minimum.  The Climate Change Commission goes on to say that “How the climate transition will impact different groups of society will depend on the exact design and timing of policies government chooses to put in place’.  In this context, we note Councils assessment is that the key issue impacting on an equitable transition is transport: “Road transport is the largest source of increasing emissions and is also the largest source of increasing costs for households. Transport is an enabler for people and there is a risk people will be left behind if the transition is not well-managed. A significant portion of the private vehicle fleet that are older, higher emitting and less fuel efficient are owned by young people and low-income families.

<sup>19</sup> Climate Change Commission, A low emissions future for Aotearoa (section 20.5)

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>Any transition policies will need to create realistic and affordable alternatives for these groups (and) transition needs to recognise that options that are realistic for urban dwellers are not necessarily so for rural dwellers”.<sup>20</sup></p> <p>We further note that – while the majority of road transport emissions are associated with light vehicles – a portion are associated with commercial vehicles and heavy transport, which do not have the options of opting instead for electric vehicles, public transport or walking/cycling.</p>
2.7	<u>Objective CC.3</u>	<p><u>To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced:</u></p> <p>(a) <u>By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels, including a:</u></p> <p>(i) <u>35 percent reduction from 2018 levels in land transport-generated greenhouse gas emissions, and</u></p> <p>(ii) <u>40 percent increase in active travel and public transport mode share from 2018 levels, and</u></p> <p>(iii) <u>60 percent reduction in public transport emissions,</u></p>	<p><b>That Objective CC.3 be deleted</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>Defer to the full review of the RPS in 2024.</p> <p>The Zero Carbon Act is intended to provide “clear and stable climate change policies”. In this context, Federated Farmers record concern that Council seeks to introduce targets which do not reflect and are not referenced to New Zealand statute (specifically the Zero Carbon Act split gas targets); but instead rely on two slim “memos”<sup>21 22</sup>, which were prepared as late as July and August 2022, authored by a person whose position is not stated, and which seek to promote a different approach. We suggest the efforts of the team of five million to put their best foot forward towards the Zero Carbon Act targets are not well served by individual councils setting their own agendas.</p> <p>In respect of transport emissions, we note Councils assessment that; “whilst our emissions overall are currently trending downwards, transport emissions are trending upwards at a concerning rate”.<sup>23</sup></p>

<sup>20</sup> GWRC submission – Climate Change Commission 2021 Draft Advice

<sup>21</sup> <https://www.gw.govt.nz/assets/Documents/2022/08/Greenhouse-gas-reduction-targets-memo-July-2022.pdf>

<sup>22</sup> <https://www.gw.govt.nz/assets/Documents/2022/08/Evaluation-of-the-preferred-regional-greenhouse-gas-target-August-2022-with-calculations-attached.pdf>

<sup>23</sup> Greater Wellington – Briefing to Incoming Ministers 2020/2021



	Name	Provision as notified	Relief sought	Reasons for relief
		<p>from 2018 levels, and</p> <p>(b) <u>By 2050, to achieve net-zero emissions.</u></p>		<p>Specifically, the trends by sector for <u>gross</u> emissions in the period 2001-2019 were<sup>24</sup>:</p> <ul style="list-style-type: none"> <li>• The largest real change was the <u>reduction</u> in agricultural emissions – down 17% or nearly 300,000 tCO<sub>2</sub>e</li> <li>• Waste reduced 36%</li> <li>• Stationary energy reduced 18%</li> <li>• Industry increased 405% (off a low base)</li> <li>• The second largest real change was the <u>increase</u> in transport emissions – up 14% or 200,000 tCO<sub>2</sub>e</li> </ul> <p>Further to the increase in transport emissions, we note Councils advice to the Climate Change Commission<sup>25</sup>:</p> <ul style="list-style-type: none"> <li>• reiterating that “road transportation is the largest source of increasing emissions”, and recommending “going hard and fast on road transport” - which is trending up</li> <li>• and that “this will create a buffer to more carefully transition the land sector” - which is trending down.</li> </ul> <p>Policy CC.2 targets <u>net</u> emissions. The Wellington Region Greenhouse Gas Inventory does not provide net emissions by sector; however, it does estimate net emissions by district. The results show<sup>26</sup>:</p> <ul style="list-style-type: none"> <li>• Wairarapa accounts for 14%</li> <li>• Kapiti accounts for 11%</li> <li>• The urban whitua (Wellington, Hutt, Porirua) account for 75% of net regional emissions</li> </ul>

<sup>24</sup> GWRC, 18 May 2020, Wellington Region Greenhouse Gas Inventory

<sup>25</sup> GWRC submission on the Climate Change Commission 2021 Draft Advice

<sup>26</sup> GWRC, 18 May 2020, Wellington Region Greenhouse Gas Inventory

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>This profile shows that – in respect of net emissions – the urban centres are by far the majority contributors, relative to the rural whaitua.</p> <p>The reasons are obvious – Wairarapa has around 70% of the land in the region, with most of the farm animals and most of the trees. That premise is equally relevant at farm scale – many or most farms have an “effective” area focussed on farming; with the balance of the farm most often set aside in trees.</p> <p>To the extent that Council seek to set targets for net emissions by sector, it will be important to estimate net emissions for each sector, ie, both emissions and sequestration. Specifically: to give proper effect to this policy, Council would need to estimate the sum of farm emissions in the region plus the sum of farm sequestration in the region, to arrive at a net figure, against which progress can be tracked. If Council has that estimate available, it should be tabled.</p> <p>In respect of transport, we note that in the recently adopted Wellington Regional Land Transport Plan (RLTP) 2021, Council - along with all local councils in the region, Waka Kotahi and KiwiRail – agreed to target a reduction in land transport emissions of 35% (and within that, a 40% increase in public transport/active travel); that these partners have collectively agreed policies to support this direction; and have identified and prioritised a programme of activities to move towards these targets.<sup>27</sup> Alongside the RLTP, we understand the RPTP (Regional Public Transport Plan) targets a 60% reduction in public transport emissions by 2030 (noting that public transport is only 3% of regional transport emissions).</p>

<sup>27</sup> GWRC submission to MfE on the Emissions Reduction Plan discussion document, 23 November 2021, page 5

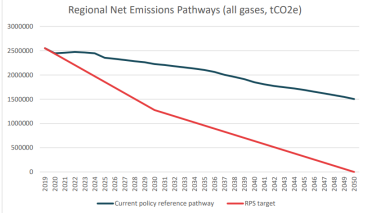
	Name	Provision as notified	Relief sought	Reasons for relief
				<p>In this context we question why Council seek to include these targets in the RPS in addition to the commitments already made in the RLTP and RPTP, including in the context that achievement is heavily contingent on central government. To be specific: Council advice to Ministers is that the concerning increase in transport emissions “will continue to increase without Government intervention”.<sup>28</sup></p> <p>The s32 report (pg 246) explains that: “The critical importance of setting targets for emissions reductions in a statutory RMA document has been highlighted by the failure of the recent court case taken against Auckland Transport for failing to give effect to the emissions reductions set out in its Regional Land Transport Plan and promised as part of Auckland Councils Climate Plan due to the lack of “inherent statutory or legal implications” of these documents”. We question whether this explanation correctly summarises the facts of that case and the implications arising.</p> <p>On our reading of the High Court decision<sup>29</sup>, the key issue relates to funding:</p> <ul style="list-style-type: none"> <li>• RLTPs are essentially funding bids from councils to NZTA, who collect and prioritise them</li> <li>• To a large extent, multi-year capex programmes are locked in</li> <li>• This creates practical difficulties in funding significant new capex projects for mode shift and decarbonisation (the multiple letters from GWRC to Ministers pressing the</li> </ul>

<sup>28</sup> Greater Wellington – Briefing to Incoming Ministers 2020/2021, page 24

<sup>29</sup> <https://static1.squarespace.com/static/6109f1ad11aa053085418634/t/62d5c2a662080036d7e0fe09/1658176168819/All+Aboard+Aotearoa+v+Ak+Transport.pdf>

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>case for increased central government investment are witness to this last point<sup>30</sup>)</p> <p>In this context, we respectfully caution that seeking to ‘lock in’ transport targets - where other parties hold the chequebooks for achieving them – may be a risky strategy.</p> <p>We note that the targets for active travel and public transport are subsidiary to – and contribute to – the primary target of 35% reduction in land transport emissions. In that context, those targets for active travel and public transport should not be expressed as objectives.</p> <p>We also note that – against the proposed overall target of 50% reduction in net emissions by 2030 - Council propose a 35% reduction in (gross) emissions from land transport. The Wellington Region Greenhouse Gas Inventory shows that land transport currently accounts for around 1.2 million tCO<sub>2</sub>e:</p> <ul style="list-style-type: none"> <li>• a 35% reduction (400,000 tCO<sub>2</sub>e) would result in around 800,000 tCO<sub>2</sub>e by 2030</li> <li>• alternately a 50% reduction would result in around 600,000 tCO<sub>2</sub>e by 2030</li> </ul> <p>This implies that Council anticipates that the “missing’ 200,000 tCO<sub>2</sub>e will be met, either by other sectors, or that exotic forestry will “cover the gap” (we suggest a dramatic change in native sequestration between now and 2030 is unlikely). We would welcome clarification.</p> <p>Returning to the overall target proposed in Objective CC.3, Council intend that it be significantly more challenging than the national targets set in the Zero</p>

<sup>30</sup>[https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKewigt\\_aFo5j6AhW41XMBHQcVdv8QFnoECAoQAQ&url=https%3A%2F%2Fwww.gw.govt.nz%2Fyour-council%2Fcouncil-and-councillors%2Fcouncil-advocacy%2F&usg=AOvVaw1TuKuop1ggzfhGdfTgJ8e](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKewigt_aFo5j6AhW41XMBHQcVdv8QFnoECAoQAQ&url=https%3A%2F%2Fwww.gw.govt.nz%2Fyour-council%2Fcouncil-and-councillors%2Fcouncil-advocacy%2F&usg=AOvVaw1TuKuop1ggzfhGdfTgJ8e)

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>Carbon Act and in the first Emissions Reduction Plan. The following graph illustrates the difference (the red line is the proposed RPS target)<sup>31</sup>:</p> <p>The two pathways for the region – one with targets and the counterfactual are shown below. The calculations that underpin these pathways are provided in the attached spreadsheet.</p>  <p>Figure 1 – Regional Net Emissions Pathways</p> <p>The difference is dramatic, begging the question as to costs and achievability: that question was addressed in an internal Council memo<sup>32</sup> which estimated the avoided costs of the RPS emission pathway compared to the counterfactual scenario<sup>33</sup>, and concluded that:</p> <ul style="list-style-type: none"> <li>• “The avoided costs range from \$6,000m to \$10,000m by 2050</li> <li>• “While these estimates are subject to a number of uncertainties and broad assumptions, they do indicate that there are significant benefits to the community from the proposed climate change objectives and that these benefits far outweigh the expected abatement costs (some of which are negative cost)”.</li> </ul> <p>Federated Farmers respectfully suggest that this brief memo (prepared at a very late stage just prior to notification) is not a reliable basis for setting binding</p>

<sup>31</sup> <https://www.gw.govt.nz/assets/Documents/2022/08/Evaluation-of-the-preferred-regional-greenhouse-gas-target-August-2022-with-calculations-attached.pdf>

<sup>32</sup> <https://www.gw.govt.nz/assets/Documents/2022/08/Evaluation-of-the-preferred-regional-greenhouse-gas-target-August-2022-with-calculations-attached.pdf>

<sup>33</sup> The “counterfactual scenario” is not referenced but is described as “the policy reference scenario developed by the Climate Change Commission”

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>targets for the region for the coming decade and out to 2050.<sup>34</sup> If Council is in possession of any further economic analysis of the costs and benefits by sector and in aggregate, that should be tabled.</p> <p>Related to that: to the extent Council have developed projections for each sector for how the proposed target will be achieved, we request that those sector projections be tabled.</p> <p>Pending that information being provided, we respectfully suggest that the proposed targets appear unrealistic: they seem to assume at least 50% reductions by 2030 across all sectors with the notable exception of land transport, ie, electricity and natural gas consumption, air and marine fuel use, solid waste disposal, industrial emissions and agricultural emissions.</p> <p>And/or, they assume very substantial – but undisclosed – sources of new carbon sequestration. At face value, this might imply pines to get quick runs on the board - but RPS Change One is instead intent on incentivising natives in preference to exotic species. If Council may have estimated the potential area of new native plantings needed to achieve the proposed target – and their associated carbon sequestration values in the period to 2030 and out to 2050 – that information should be tabled.</p> <p>For context, it is our understanding that StatsNZ have reported that the biggest annual emissions reduction New Zealand has achieved to date was nearly 5% reduction in the year to December 2020 when New Zealand was in lockdown. On our reading of the</p>

<sup>34</sup> Federated Farmers are additionally not clear whether Council have employed conventional accounting rules in respect of which emissions are included in the base year (gross-net) and target year (net); or whether some other methodology has been employed

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>Council targets, they imply a greater change to economic activity than that experienced during 2020; and that this Council-directed ‘lockdown’ would accelerate year on year.</p> <p>Alternatively, it may be that Council is relying on the results of two reports which we understand are under development, ie, a Regional Emissions Reduction Strategy (scheduled for completion in June 2023) and a “Low Carbon Economy Transition Report”. If this be the case, then those reports – which we assume will be co-designed with major sectors, including agriculture – could inform the full review of the RPS scheduled in 2024.</p> <p>We agree with Councils advice to the Climate Change Commission re converting crisis to opportunity: ‘The opportunity has to be in activating shared and cross-government and sector responses to climate change – that don’t disadvantage our economic resiliency, and advantage our response and activities that benefit from connections and enable commercial leadership in climate change solutions’.<sup>35</sup></p> <p>Which brings us to agriculture: we agree the opportunity is to enable commercial leadership in climate change solutions that don’t disadvantage our economic resiliency, and primary sector export earnings relative to the post-Covid wall of debt.</p> <p>Related to this last point, the following graph shows Treasury baseline projections of debt relative to GDP to 2060<sup>36</sup>:</p>

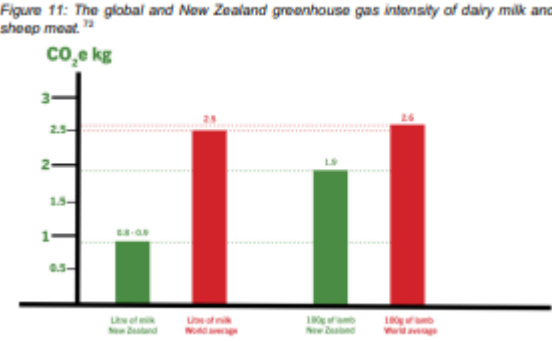
<sup>35</sup> GWRC submission on the Climate Change Commission 2021 Draft Advice

<sup>36</sup> [Statement on the Long Term Fiscal Position](#)

	Name	Provision as notified	Relief sought	Reasons for relief																																																																																																																																														
				<div data-bbox="1541 236 1921 446"> <p>Net core Crown debt to GDP (%)</p> <table border="1"> <caption>Approximate data for Net core Crown debt to GDP (%)</caption> <thead> <tr><th>Year</th><th>Debt to GDP (%)</th></tr> </thead> <tbody> <tr><td>2007</td><td>20</td></tr> <tr><td>2008</td><td>25</td></tr> <tr><td>2009</td><td>25</td></tr> <tr><td>2010</td><td>25</td></tr> <tr><td>2011</td><td>25</td></tr> <tr><td>2012</td><td>25</td></tr> <tr><td>2013</td><td>25</td></tr> <tr><td>2014</td><td>25</td></tr> <tr><td>2015</td><td>25</td></tr> <tr><td>2016</td><td>25</td></tr> <tr><td>2017</td><td>25</td></tr> <tr><td>2018</td><td>25</td></tr> <tr><td>2019</td><td>25</td></tr> <tr><td>2020</td><td>25</td></tr> <tr><td>2021</td><td>25</td></tr> <tr><td>2022</td><td>25</td></tr> <tr><td>2023</td><td>40</td></tr> <tr><td>2024</td><td>50</td></tr> <tr><td>2025</td><td>60</td></tr> <tr><td>2026</td><td>70</td></tr> <tr><td>2027</td><td>80</td></tr> <tr><td>2028</td><td>90</td></tr> <tr><td>2029</td><td>100</td></tr> <tr><td>2030</td><td>110</td></tr> <tr><td>2031</td><td>120</td></tr> <tr><td>2032</td><td>130</td></tr> <tr><td>2033</td><td>140</td></tr> <tr><td>2034</td><td>150</td></tr> <tr><td>2035</td><td>160</td></tr> <tr><td>2036</td><td>170</td></tr> <tr><td>2037</td><td>180</td></tr> <tr><td>2038</td><td>190</td></tr> <tr><td>2039</td><td>200</td></tr> <tr><td>2040</td><td>210</td></tr> </tbody> </table> </div> <p>Against that ballooning debt, the Minister for Agriculture reports that the primary industries achieved record export earnings of over \$50 billion in the year to June 2022 and is on course to achieve nearly \$70 billion by 2030: ‘The sector is leading NZs economic recovery from Covid-19 and the investment we’re making together as part of ‘Fit for a Better World’ will help us well into the future’<sup>37</sup>.</p> <div data-bbox="1563 858 2116 1129"> <p>Figure 1: MPI export revenue forecasts Year to 30 June, 2014–22</p> <table border="1"> <caption>Approximate data for MPI export revenue forecasts (Billions of dollars)</caption> <thead> <tr><th>Year</th><th>Jun 2020</th><th>Dec 2021</th><th>Jun 2022</th></tr> </thead> <tbody> <tr><td>2014</td><td>30</td><td>30</td><td>30</td></tr> <tr><td>2015</td><td>35</td><td>35</td><td>35</td></tr> <tr><td>2016</td><td>40</td><td>40</td><td>40</td></tr> <tr><td>2017</td><td>45</td><td>45</td><td>45</td></tr> <tr><td>2018</td><td>50</td><td>50</td><td>50</td></tr> <tr><td>2019</td><td>55</td><td>55</td><td>55</td></tr> <tr><td>2020</td><td>55</td><td>55</td><td>55</td></tr> <tr><td>2021</td><td>55</td><td>55</td><td>55</td></tr> <tr><td>2022</td><td>60</td><td>60</td><td>60</td></tr> <tr><td>2023</td><td>65</td><td>65</td><td>65</td></tr> <tr><td>2024</td><td>70</td><td>70</td><td>70</td></tr> <tr><td>2025</td><td>75</td><td>75</td><td>75</td></tr> <tr><td>2026</td><td>80</td><td>80</td><td>80</td></tr> <tr><td>2027</td><td>85</td><td>85</td><td>85</td></tr> <tr><td>2028</td><td>90</td><td>90</td><td>90</td></tr> <tr><td>2029</td><td>95</td><td>95</td><td>95</td></tr> <tr><td>2030</td><td>100</td><td>100</td><td>100</td></tr> </tbody> </table> </div> <p>As well as being a major exporter of high-quality livestock products, New Zealand dairy and red meat production is much more emissions efficient than the global average. The emissions efficiency of New</p>	Year	Debt to GDP (%)	2007	20	2008	25	2009	25	2010	25	2011	25	2012	25	2013	25	2014	25	2015	25	2016	25	2017	25	2018	25	2019	25	2020	25	2021	25	2022	25	2023	40	2024	50	2025	60	2026	70	2027	80	2028	90	2029	100	2030	110	2031	120	2032	130	2033	140	2034	150	2035	160	2036	170	2037	180	2038	190	2039	200	2040	210	Year	Jun 2020	Dec 2021	Jun 2022	2014	30	30	30	2015	35	35	35	2016	40	40	40	2017	45	45	45	2018	50	50	50	2019	55	55	55	2020	55	55	55	2021	55	55	55	2022	60	60	60	2023	65	65	65	2024	70	70	70	2025	75	75	75	2026	80	80	80	2027	85	85	85	2028	90	90	90	2029	95	95	95	2030	100	100	100
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<sup>37</sup> <https://fitforabetterworld.org.nz/assets/publications/2022-Fit-for-a-Better-World-progress-update.pdf>



	Name	Provision as notified	Relief sought	Reasons for relief													
				<p>Zealand milk and lamb meat is illustrated in the following graph: <sup>38</sup></p>  <p><b>Figure 11: The global and New Zealand greenhouse gas intensity of dairy milk and sheep meat.</b> <sup>32</sup></p> <table border="1"> <caption>Data from Figure 11: Greenhouse Gas Intensity (CO<sub>2</sub>e kg)</caption> <thead> <tr> <th>Product</th> <th>Location</th> <th>Intensity (CO<sub>2</sub>e kg)</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1kg of milk</td> <td>New Zealand</td> <td>0.9</td> </tr> <tr> <td>World average</td> <td>2.5</td> </tr> <tr> <td rowspan="2">1kg of lamb</td> <td>New Zealand</td> <td>1.9</td> </tr> <tr> <td>World average</td> <td>2.6</td> </tr> </tbody> </table> <p>Federated Farmers does not under-estimate the challenge of making progress on climate change targets while growing primary sector export earnings and continuing to improve the emissions efficiency of our production systems, but Federated Farmers and the wider primary sector are up for the challenge, and Council is aware of primary sector leadership in this space.</p> <p>We note however that Council seems to labour under the misapprehension that it is all about emission pricing, and beyond that there is a vacuum which should be filled with RPS Change One.</p> <p>For example, the s32 report (pg 37) references a Climate Change Commission report to state that “the</p>	Product	Location	Intensity (CO <sub>2</sub> e kg)	1kg of milk	New Zealand	0.9	World average	2.5	1kg of lamb	New Zealand	1.9	World average	2.6
Product	Location	Intensity (CO <sub>2</sub> e kg)															
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<sup>38</sup> Climate Change and the Global Dairy Cattle Sector: The role of the dairy sector in a low-carbon future, the Food and Agriculture Organisation of the United Nations and the Global Dairy Platform Inc, Rome 2019, pp.26 Clune, Stephen, Enda Crossin, and Karli Verghese. "Systematic review of greenhouse gas emissions for different fresh food categories. Ledgard, S.F., Chobtang, J., Falconer, S.J. and McLaren, S., 2016. Life cycle assessment of dairy production systems in New Zealand, Integrated nutrient and water management for sustainable farming. (Eds L.D. Currie and R.Singh). <http://flrc.massey.ac.nz/publications.html>. Occasional Report No. 29. Fertilizer and Lime Research Centre, Massey University, Palmerston North, New Zealand. 8 pages. 1 LIFE CYCLE ASSESSMENT

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>ETS alone will likely not deliver the new technologies and processes required to achieve the required levels of emissions reductions". The s32 report omitted to mention that that report went on to make recommendations for a package of other measures including<sup>39</sup>:</p> <ul style="list-style-type: none"> <li>• Enabling innovation and system transformation, eg, 'There are significant barriers to changing landuse, such as a lack of existing markets, supply chains, and access to resources such as water"</li> <li>• Actions to address barriers, eg, removing barriers to the deployment of emerging technologies that reduce emissions</li> <li>• Investing in R&amp;D to deliver technology that would deliver bigger emissions reductions in the future</li> </ul> <p>In respect of R&amp;D, AgResearch recently updated on the role its scientists played in He Waka Eke Noa <sup>40</sup>:</p> <ul style="list-style-type: none"> <li>• "A dedicated team of experts from AgResearch became a key source of knowledge for the primary sector partnership known as He Waka Eka Noa (HWEN), which comprises industry bodies, Māori, MPI and the Ministry for the Environment. It aims to implement a framework by 2025 to reduce agricultural emissions.</li> <li>• AgResearch scientists Drs Cecile De Klein, Robyn Dynes, Diana Selbie, and Tony Van Der Weerden participated in advisory groups as experts in measuring and managing emissions, methods of adaption, and sequestration in a farm system's context.</li> </ul>


<sup>39</sup> Climate Change Commission, A Low Emissions Future for Aotearoa

<sup>40</sup> AgResearch News, 15 September 2022

	Name	Provision as notified	Relief sought	Reasons for relief
				<ul style="list-style-type: none"> <li>• As well as having a strong presence on HWEN working groups, AgResearch's chief executive, Dr Sue Bidrose, was a member of MPI's Biogenic Emissions Reduction Science Accelerator (BERSA) leadership group</li> <li>• Working on the solutions will remain Cecile's main focus but having influence over the policy and direction the sector is taking was in her words, "a very rewarding experience that can only improve the research we do at AgResearch." "I'm a bit of an integrator. I really enjoy getting people together to see what we can achieve and consider other ways of doing things. It will influence how we help New Zealand to get where it needs to go. Previously my network was largely research focused. But now having contacts and knowledge of the regulatory pathways and the huge hurdles there, which was completely unknown to me, has really been important for me and helped me get a much better understanding of the challenges we must overcome"</li> <li>• Dr De Klein remains optimistic that Aotearoa New Zealand can meet its emissions targets: "I think the generation coming through now can have hope. We are going to go through some big changes but I feel confident that we can adapt and use fundamental science and come up with innovations, tools, and use elements of commercialisation, which is what farming is good at, which will make the future of the industry more sustainable. As long as there is a good seamless connection between science and policy, I can see how it could work."</li> </ul>

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>The s32 report also omits to mention that the Climate Change Commission heard consistently through their engagement and consultation that it will be vital to work alongside people to co-design policies that maximise the benefits and reduce the negative impacts: “Transparent, inclusive and co-designed processes, and active social dialogue regarding the transition, are key to achieving a transition that is accepted by all parts of society and enduring as a result”.<sup>41</sup></p> <p>We respectfully suggest that rushing out RPS Change One with minimal consultation to be litigated at arms-length through a hearing process is less than the transparent, inclusive and co-designed process that we would like to see in this region.</p>
2.8	<p><b>Objective CC.4</b></p> 	<p><u>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.</u></p>	<p><b>That Objective CC.4 be deleted</b></p> <p>Delete the FW icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>Accepting the value of “nature-based solutions”, the scale of the challenges and opportunities in front compel a wider portfolio of tools in our toolbox to address them including nature-based solutions, constructed or engineered solutions and technological developments.</p> <p>We also note that enlarging the contribution of NBS is contingent on human agency and innovation, and that NBS may integrate both “natural” and “constructed” elements, eg, in the case of water storage.</p> <p>Our proposed new over-arching Objective B is intended as a practical pathway towards a similar result.</p>


<sup>41</sup> Climate Change Commission, A Low Emissions Future for Aotearoa

	Name	Provision as notified	Relief sought	Reasons for relief
2.9	<b>Objective CC.5</b> 	By 2030, there is an increase in the area of <i>permanent forest</i> in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well-being.	<b>That Objective CC.5 be deleted</b>  Delete the FW icon  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.	An increase in trees and forest of any type – permanent or plantation forests, continuous canopy forests, agro-forestry - can be expected to contribute to the outcomes sought; as can silvo-pastoral systems, eg, the space planted trees which have been a mainstay of the region’s hill country erosion programme for many decades; or indeed the many kilometres of riparian trees planted throughout the region. In respect of all the above, we suggest the intent should be to optimise across diverse values and uses, rather than maximise any one element.  We note the Climate Change Commission takes a broad view of afforestation: “Some of this could be integrated onto farms through “mosaic’ landuse systems...farmers can also plant small blocks of production forest on accessible parts of their land...agro-forestry systems are another option. These systems integrate trees into cropping or pasture systems, enhancing on-farm sequestration while also diversifying income” <sup>42</sup>
2.10	<b>Objective CC.6</b>	<u>Resource management and adaptation planning increase the resilience of communities and the natural environment to the short, medium, and long-term effects of climate change.</u>	<b>That Objective CC.6 be deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Accepting the sentiment, we suggest the wording is somewhat high-level.  Our proposed alternate over-arching Objective A and Objective B are intended as more concrete objectives and pathways to achieve a similar result.
2.11	<b>Objective CC.7</b>	<u>People and businesses understand what climate change means for their future and are actively involved in planning and implementing appropriate <i>mitigation</i> and <i>adaptation</i> responses.</u>	<b>That Objective CC.7 be deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.	As for Objective CC.6

<sup>42</sup> Climate Change Commission, A Low Emissions Future for Aotearoa



	Name	Provision as notified	Relief sought	Reasons for relief
2.12	<u>Objective CC.8</u>	<u>Iwi and hapū are empowered to make decisions to achieve climate-resilience in their communities.</u>	<p><b>Delete Objective CC.8</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	As for Objective CC.6

	<b>Name</b>	<b>Provision as notified</b>	<b>Relief sought</b>	<b>Reasons for relief</b>
3	<b>Proposed amendments to Chapter 3.3: Energy, infrastructure, and waste</b>			
3.1	Whole chapter	<u>All proposed amendments</u>	<b>That the proposed amendments to Chapter 3.3 be deleted</b>	Energy, infrastructure and waste issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024.
3.2	<b>Changes to Table 3 Energy, infrastructure and waste objectives and titles of policies and methods to achieve the objectives</b>	All provisions in Table 3	<b>Delete all provisions</b>  And make consequential amendments to related policies and methods	Defer to the full review of the RPS in 2024.  The proposed amendments are principally tinkering with words; and not adding much of value which could not be more properly addressed in 2024.

	Name	Provision as notified	Relief sought	Reasons for relief
4	<b>Proposed amendments to Chapter 3.4: Fresh water</b>			
4.1	Whole chapter	<u>All proposed amendments</u>	<b>That the proposed amendments to Chapter 3.4 be deleted</b>	Freshwater issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024; and in a RPS Change specific to water in parallel with the NRP Change scheduled for urban whaitua in 2023.
4.2	<b>Chapter Introduction</b> 	<p>(Existing introductory text not repeated here)</p> <p><u>The Te Mana o Te Wai objective is required by the NPS-FM (3.2(3)). Each iwi of the region have expressed what Te Mana o Te Wai means to them in their own words. These expressions of Te Mana o Te Wai form part of this objective.</u></p> <p><u>The NPS-FM requires that freshwater is managed in a way that gives effect to Te Mana o te Wai. The regional council “must include an objective in its regional policy statement that describes how the management of freshwater in the region will give effect to Te Mana o te Wai” (NPS-FM 3.2 (3)). The Te Mana o Te Wai objective in this RPS repeats the requirements of the NPS-FM, and then provides how each iwi of the region wishes to articulate their meaning of Te Mana o Te Wai.</u></p> <p><u>Note: There are six iwi wishing to express their meaning of Te Mana o Te Wai as part of this objective. There are two</u></p>	<p><b>Delete the proposed amendments to the introduction.</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>The introduction is now very out-of-date and incorrect in a number of respects, for example, it does not include reference to recent assessments of regional water quality trends (presented as Council evidence during Hearings on the pNRP), ie:</p> <ul style="list-style-type: none"> <li>• there is no evidence of region-wide degradation</li> <li>• there is strong evidence of overall water quality improvement at the regional level over the past decade<sup>43</sup></li> </ul> <p>We note that the proposed amendments do not update the regional issues, but simply insert the new concept of Te Mana o Te Wai to help give effect to the NPS-FM.</p> <p>However, the NPS-FM does not require that the RPS be amended simply to repeat the objective of the NPS-FM: instead the NPS-FM directs (3.2) that every regional council must engage with communities and tangata whenua to determine how Te Mana o Te Wai applies in the region; in doing so, engage (inter alia) with communities and tangata whenua to identify long-term visions and environmental outcomes; include an objective in its regional policy statement that describes how the management of freshwater in the region will give effect to Te Mana o te Wai; and include objectives in its regional policy statement setting out long-term visions for freshwater.</p>

<sup>43</sup> Statement of Right of Reply Evidence of Antonius Hugh Snelder on behalf of Wellington Regional Council, Technical – Regional Water Quality Trends, 4 May 2018



	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>expressions of Te Mana o Te Wai in this RPS at this time from Rangitāne o Wairarapa and Kahungunu ki Wairarapa. Others will be added either through the Schedule 1 process or in future plan changes.</u></p> <p><u>All policies and methods in this RPS relating to freshwater must contribute to achieving this objective.</u></p>		<p>Federated Farmers understand that Council intend to notify regional plan changes in 2023 (urban whitua) and 2024 (rural whitua) to give effect to the NPS-FM; in addition to the scheduled review of the RPS in 2024 (and potentially an additional review of the RPS in 2023 to align with NRP changes at that time).</p> <p>Federated Farmers submit that the appropriate time to give integrated consideration to full implementation of the NPS-FM will be in 2023 for the urban whitua (with parallel changes to the RPS and NRP in respect of freshwater provisions); and a similar parallel process in 2024 for the rural whitua.</p> <p>At those times, the introduction could and should be updated to include up-to-date state and trend data for each whitua, and the results of investigations undertaken, eg, as directed by NRP Method M10 Water Quality Investigations</p>
4.3	<p>Amendments to Table 4: Fresh water objectives and titles of policies and methods to achieve the objectives</p> 	All provisions in Table 4	<p><b>Delete, or alternatively, amend Objectives in Table 4 as per relevant relief sought in relation to submissions on Objectives set out below; and amend or delete reference to Policies in Table 4 as per relief sought in relation to submission on Policies set out below; and make consequential amendments to related methods</b></p>	As set out above, defer to the upcoming plan changes in 2023 for urban whitua, and 2024 for rural whitua.
4.4	<p>Amendments to Objective 12</p> 	<p><u>Natural and physical resources of the region are managed in a way that</u></p>	<p><b>Delete the amendments to Objective 12.</b></p>	As set out above, defer to the upcoming plan changes in 2023 for urban whitua, and 2024 for rural whitua.

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>prioritises:</u></p> <p>(a) <u>first, the health and well-being of water bodies and freshwater ecosystems</u></p> <p>(b) <u>second, the health needs of people (such as drinking water)</u></p> <p>(c) <u>third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future; and</u></p> <p><u>Te Mana o te Wai encompasses six principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this RPS and its implementation. The six principles are:</u></p> <p>(a) <u>Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater</u></p> <p>(b) <u>Kaitiakitanga: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations</u></p> <p>(c) <u>Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others</u></p> <p>(d) <u>Governance: the responsibility of those with authority for making</u></p>	<p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>The s32 report (pg 87) justifies the need for the changes in part by stating that ‘The status quo has not been sufficient in halting the ongoing degradation of freshwater in the region’. This statement is at odds with evidence presented by Council during the recent pNRP Hearing which found “strong evidence of overall water quality improvement at the regional level over the past decade”.<sup>44</sup></p> <p>As the objective currently reads, the proposed amendments are in three parts and add up to an extraordinarily long (15 pages) and unwieldy objective (which has the appearance of being cobbled together at a late stage).</p> <p>In respect of the first part, it is not necessary to repeat the NPS-FM objective in the RPS.</p> <p>In respect of the second part, these “principles” are not expressed as objectives in the NPS-FM; and again it is not necessary to repeat them in the RPS.</p> <p>In respect of the third part:</p> <ul style="list-style-type: none"> <li>• statements are attached from two iwi in the region (but not from four others nor other community stakeholders)</li> <li>• these two statements include visions (but Council have clarified that there are no freshwater visions as required by section 3.3 of the NPS-FM in RPS Change One<sup>45</sup>)</li> <li>• these two statements present multiple objectives and policies (within the overall objective), which at the least creates significant difficulties in interpreting how</li> </ul>

<sup>44</sup> <sup>44</sup> Statement of Right of Reply Evidence of Antonius Hugh Snelder on behalf of Wellington Regional Council, Technical – Regional Water Quality Trends, 4 May 2018

<sup>45</sup> Email communication 9 September 2022

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future</u></p> <p>(e) <u>Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations, and</u></p> <p>(f) <u>Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation.</u></p> <p><u>And the Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa</u></p>		<p>Objective 12 is intended to be read and applied.</p> <p>Acknowledging the central importance of water expressed in the Wairarapa iwi statements, Federated Farmers submit these matters are too important to be rushed through in a hastily compiled amendment and should more properly be considered with the full engagement of the community as anticipated by the NPS-FM in the upcoming plan changes in 2023 and 2024.</p> <p>Federated Farmers also record concern that the effect of this rushed and piecemeal approach is to undermine the integrity of the whitua processes. We note that Council to date has prided itself on its “sector-leading” whitua programme, recording that “this is how we demonstrate Te Mana o Te Wai in practice”.<sup>46</sup></p> <p>We note that the s32 Report (pg 84, 89) records that: ‘Te Mana o Te Wai is a Te Ao Maori concept. Therefore it should be expressed, interpreted and applied by tangata whenua’. That is not our reading of the NPS-FM. Related to this, we note that the Environment Court in Aratiatia stated that: “Te Mana o te Wai [and indeed ki uta ki tai] while expressed in the NPS-FM in te reo Maori, benefits all New Zealanders. Te Mana o te Wai is not a “Maori centric” but a “water centric” approach”<sup>47</sup>; and that this point was reiterated in a 2021 Environment Court decision which stated ““The Court’s observations in <i>Aratiatia Livestock Ltd</i> remain relevant”.<sup>48</sup></p>

<sup>46</sup> Greater Wellington – Briefing to Incoming Ministers 2020/2021 (page 10)


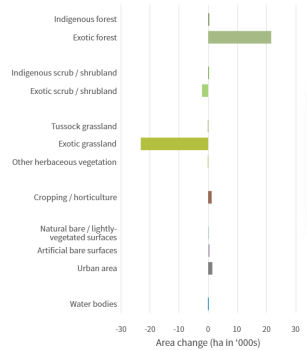
<sup>47</sup> Decision No. [2020] NZEnvC 93

<sup>48</sup> Decision No. [2021] NZEnvC 164

	Name	Provision as notified	Relief sought	Reasons for relief
5	<b>Proposed amendments to Chapter 3.6: Indigenous Ecosystems</b>			
5.1	Whole chapter	<u>All proposed amendments</u>	<b>That the proposed amendments to Chapter 3.6 be deleted</b>	<p>Indigenous ecosystem issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024, informed by the upcoming NPS for Indigenous Biodiversity (NPS-IB).</p> <p>The s32 report (para 69) records Council’s intention to “pre-emptively” consider the exposure draft of the NPS-IB. At the same time, Councils assessment<sup>49</sup> is that gazettal of a NPS-IB will have “significant impacts on Greater Wellington as it will necessitate changes to key policy direction (eg, the RPS) and require substantive funding to implement its direction”.</p> <p>Federated Farmers record concern at this cavalier approach to public policy, and the un-necessary drain on Council and stakeholder resources litigating the same issue at the national level – and not once but twice – at the regional level.</p>
5.2	Identification of freshwater (FW) planning instruments	Proposed provisions with FW icon	<b>Delete FW icons</b>	We do not agree that any of the proposed indigenous ecosystem provisions are freshwater instruments, including for the reasons set out in a recent High Court decision. <sup>50</sup>

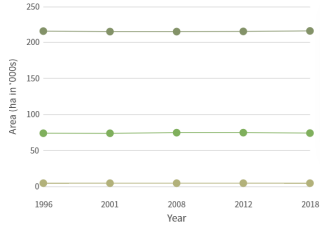
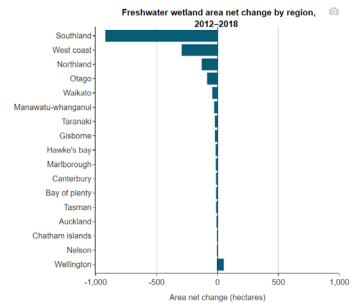
<sup>49</sup> Environment Committee, 23 June 2022 order paper – submission on the NPS for Indigenous Biodiversity

<sup>50</sup> CIV-2021-412-000089 [2022] NZHC 1777: Otago Regional Council v Royal Forest and Bird Protection Society



	Name	Provision as notified	Relief sought	Reasons for relief																										
5.3	<p><b>Chapter 3.6 Introduction</b></p> 	<p>(Amendments to introductory text not repeated here).</p> <p>The regionally significant issues and the issues of significance to the Wellington region's iwi authorities for indigenous ecosystems are:</p> <ol style="list-style-type: none"> <li>The region's indigenous ecosystems are reduced in extent</li> </ol> <p>The region's indigenous ecosystems have been significantly reduced in extent <u>and are being increasingly fragmented. Loss of area, <b>ecological integrity</b> and <b>ecological connectivity</b> reduce the <b>resilience</b> of ecosystems to respond to ongoing pressures, threatening their persistence and that of the indigenous biodiversity and <b>mahinga kai</b> they support. The indigenous ecosystems most reduced in extent are specifically:</u></p> <ol style="list-style-type: none"> <li>wetlands</li> <li>lowland forests</li> <li>lowland streams</li> <li>coastal duneslands and escarpments</li> <li>estuaries</li> <li>eastern 'dry land' forests.</li> </ol> <ol style="list-style-type: none"> <li>The region's remaining indigenous ecosystems are under threat</li> </ol>	<p><b>Delete the proposed amendments to the introduction.</b></p> <p>Delete the FW icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>Defer to the full review of the RPS in 2024, at which time the introduction can be informed by careful analysis and interpretation of up-to-date regional state of the environment data.</p> <p>Currently, the introduction is out-of-date and incorrect in a number of respects.</p> <p>For example, it does not include reference to recent data on indigenous landcover, eg, the following graph<sup>51</sup> illustrating no change or small increases in indigenous cover in the period 1996-2018 (the more compelling statistics in this graph are the decrease of more than 20,000ha of exotic grassland, and the increase of more than 20,000ha of exotic forest).</p> <div data-bbox="1554 730 1859 1141"> <p>Medium land cover classes Change between 1996 and 2018</p>  <table border="1"> <caption>Medium land cover classes: Change between 1996 and 2018</caption> <thead> <tr> <th>Land cover class</th> <th>Area change (ha in '000s)</th> </tr> </thead> <tbody> <tr> <td>Indigenous forest</td> <td>~0</td> </tr> <tr> <td>Exotic forest</td> <td>~20</td> </tr> <tr> <td>Indigenous scrub / shrubland</td> <td>~0</td> </tr> <tr> <td>Exotic scrub / shrubland</td> <td>~0</td> </tr> <tr> <td>Tussock grassland</td> <td>~0</td> </tr> <tr> <td>Exotic grassland</td> <td>~-20</td> </tr> <tr> <td>Other herbaceous vegetation</td> <td>~0</td> </tr> <tr> <td>Cropping / horticulture</td> <td>~0</td> </tr> <tr> <td>Natural bare / lightly-vegetated surfaces</td> <td>~0</td> </tr> <tr> <td>Artificial bare surfaces</td> <td>~0</td> </tr> <tr> <td>Urban area</td> <td>~0</td> </tr> <tr> <td>Water bodies</td> <td>~0</td> </tr> </tbody> </table> </div> <p>Or alternatively the following graph showing just indigenous land cover - indigenous forest stable at 216,000ha, indigenous scrub stable at 74,000ha, tussock grassland stable at 4,000ha – total indigenous landcover stable at just under 300,000ha over the last 20+ years<sup>52</sup>:</p>	Land cover class	Area change (ha in '000s)	Indigenous forest	~0	Exotic forest	~20	Indigenous scrub / shrubland	~0	Exotic scrub / shrubland	~0	Tussock grassland	~0	Exotic grassland	~-20	Other herbaceous vegetation	~0	Cropping / horticulture	~0	Natural bare / lightly-vegetated surfaces	~0	Artificial bare surfaces	~0	Urban area	~0	Water bodies	~0
Land cover class	Area change (ha in '000s)																													
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<sup>51</sup> LAWA website, Wellington Region Landcover, accessed September 2022

<sup>52</sup> LAWA website, Wellington Region Landcover, accessed September 2022

	Name	Provision as notified	Relief sought	Reasons for relief
		<p>The region’s remaining indigenous ecosystems, <u>and the ecosystem processes that support them</u>, continue to be degraded or lost <u>due to ongoing pressure from invasive species, human use and development, and the effects of climate change</u></p> <p>3. <u>Iwi and landowner values and roles are not adequately recognised and supported</u></p> <p><u>Mana whenua /tangata whenua values, including kaitiakitanga, are not adequately recognised and supported by the current approach to managing indigenous biodiversity. The conservation efforts of landowners, as stewards of their land, and local communities could be better recognised and supported</u></p>		<p><b>How has land cover changed over time?</b> Select land cover class(es) from the list below</p>  <p>It does not include reference to a net gain in wetlands, eg, the following graph referenced by Council in their recent submission on national wetland policies, showing “Wellington is the only region in the country to have held the line on wetland loss and even achieved a net gain”<sup>53</sup>:</p>  <p>Instead, the s32 report relies on ill-evidenced assertions about regional loss of wetlands (para 70) to justify pre-empting the NPS-IB; and further relies (para 71) on assertions that only two territorial</p>

<sup>53</sup> Council submission to Ministry for the Environment on the Exposure Drafts of the NPS and NES for Freshwater, 8 July 2022, paragraph 4 including graph


	Name	Provision as notified	Relief sought	Reasons for relief
				<p>authorities (Kapiti, Porirua) have identified and protected significant natural areas (SNAs) “despite being required by the RMA since 1991”.</p> <p>Our reading of the Wairarapa Combined District Plan is that it does include SNAs; and our reading of the Wellington City District Plan is that its schedule of “conservation sites” across five geographic areas might be similar to SNAs. To the extent, it is not – and to the extent that Lower Hutt and Upper Hutt may have been making haste slowly – it is our understanding that these three urban councils have planning underway, pending the promulgation of the NPS-IB.</p>
5.4	<p>Amendments to Table 6(a): Indigenous ecosystems objective and titles of policies and methods to achieve the objective</p> 	All provisions in Table 6(a)	<p><b>Delete or alternatively, amend Objectives in Table 6A as per relevant relief sought in relation to submissions on Objectives set out below; amend or delete reference to Policies in Table 6A as per relief sought in relation to submission on Policies set out below; and make consequential amendments to related methods</b></p> <p><b>Delete the freshwater icons</b></p>	Defer to the full review of the RPS in 2024.
5.5	<p><b>Objective 16</b></p> 	Indigenous ecosystems and habitats with significant <u>ecosystem functions and services</u> and/or biodiversity values are <del>maintained</del> <u>protected, enhanced,</u> and restored to a healthy functioning state.	<p><b>That the amendments to Objective 16 be deleted.</b></p> <p>To the extent amendments are made, delete the FW icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>Defer to the full review of the RPS in 2024.</p> <p>The proposed amendments are “muddying” an RMA s6 matter, ie, the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna</p>

	Name	Provision as notified	Relief sought	Reasons for relief
5.6	<b>Objective 16A</b> 	<u>The region's indigenous ecosystems are maintained, enhanced, and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.</u>	<b>That Objective 16A be deleted.</b>  Delete the FW icon  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.	Defer to the full review of the RPS in 2024.
5.7	<b>Objective 16B</b> 	<u>Mana whenua / tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making, and mana whenua / tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity.</u>	<b>That Objective 16B be deleted.</b>  Delete the FW icon  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to the full review of the RPS in 2024.
5.8	<b>Objective 16C</b> 	<u>Landowner and community values in relation to indigenous biodiversity are recognised and provided for and their roles as stewards are supported</u>	<b>That Objective 16C be deleted</b>  Delete the FW icon  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to the full review of the RPS in 2024.  Our proposed alternate over-arching Objective A and Objective B are intended as more concrete objectives and pathways to achieve a similar result.




	Name	Provision as notified	Relief sought	Reasons for relief
6	<b>Proposed amendments to Chapter 3.8: Natural hazards</b>			
6.1	Whole chapter	<u>All proposed amendments</u>	<b>That the proposed amendments to Chapter 3.8 be deleted</b>	Natural Hazards issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024.  The proposed amendments are principally tinkering with words; and not adding much of value which could not be more properly addressed in 2024.
6.2	Identification of freshwater (FW) planning instruments	Proposed provisions with FW icon	<b>Delete FW icons</b>	We do not agree that any of the proposed natural hazard provisions are freshwater instruments, including for the reasons set out in a recent High Court decision. <sup>54</sup>
6.3	<u>Amendments to Table 8(a)</u>	All provisions in Table 8(a)	<b>Delete or alternatively, amend Objectives in Table 8(a) as per relevant relief sought in relation to submissions on Objectives set out below; and delete or amend Policies in Table 8(a) as per relief sought in relation to submission on Policies set out below; and make consequential amendments to related methods</b>	Defer to the full RPS review in 2024.
6.4	<b>Objective 19</b>	The risks and consequences to people, communities, <del>their</del> businesses, property, and infrastructure <u>and the environment</u> from natural hazards and <u>the effects of</u> climate change effects are <del>reduced</del> <u>minimised</u> .	<b>Delete the proposed amendments</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to the RPS review in 2024

<sup>54</sup> CIV-2021-412-000089 [2022] NZHC 1777: Otago Regional Council v Royal Forest and Bird Protection Society

	Name	Provision as notified	Relief sought	Reasons for relief
6.5	<b>Objective 20</b> 	<p><u>Natural hazard and climate change mitigation and adaptation activities minimise the risks from natural hazards and impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity.</u></p> <p><del>Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events.</del></p>	<p><b>Delete the proposed amendments</b></p> <p>Delete the FW icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	Defer to the RPS review in 2024
6.6	<b>Objective 21</b>	<p><del>The resilience of our communities are more resilient to natural hazards, including the impacts and the natural environment to the short, medium, and long-term effects of climate change, and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.</del></p>	<p><b>Delete the proposed amendments</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	Defer to the RPS review in 2024

	Name	Provision as notified	Relief sought	Reasons for relief
7	<b>Proposed amendments to Chapter 3.9: Regional form, design and function</b>			
7.1	Chapter Title	Regional form, design and function	<b>That the Chapter 3.9 title be amended to read Urban form, design and function (or Urban form and development).</b>	<p>The National Planning Standards direct that Regional Policy Statements should include a chapter on urban form and development.</p> <p>Consistent with this direction, the existing chapter introduction and the proposed amendments to it (to give effect to the NPS for Urban Development) are all clearly directed to urban areas.</p> <p>It is currently a significant omission that the RPS does not include a chapter for rural areas in the region. To the extent Council may seek to recognise rural areas – and Federated Farmers would support this - it would be appropriate to consider a new rural chapter in the full review of the RPS in 2024, for example to recognise:</p> <ul style="list-style-type: none"> <li>• the importance of primary production to the region</li> <li>• objectives to support a thriving bio-economy, and the viability and vibrancy of rural areas and communities</li> <li>• objectives to provide for and enable diverse landuses (animal-based and plant-based), and to support integrative plant/animal systems (eg, regenerative farming, agro-forestry, silvo-pastoral systems)</li> <li>• enabling policies for innovation and transformative investments, eg, water storage</li> </ul>
7.2	Identification of freshwater (FW) planning instruments	Proposed provisions with FW icon	<b>Delete FW icons</b>	We do not agree that any of the proposed regional form, design and function provisions are freshwater instruments, including for the reasons set out in a recent High Court decision. <sup>55</sup>

<sup>55</sup> CIV-2021-412-000089 [2022] NZHC 1777: Otago Regional Council v Royal Forest and Bird Protection Society


	Name	Provision as notified	Relief sought	Reasons for relief
7.3	<b>Objective 22B</b> 	<u>Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features identified in this RPS are managed effectively.</u>	<b>That Objective 22B be deleted</b>  Delete the FW icon  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	This proposed new objective does not fit in this chapter which is focussed on urban areas; and as currently structured is uncertain in its intent and application.  The s32 report clarifies that it is intended to compensate for deleting clause f of Objective 22 – our reading of clause f is that it relates to rural residential development which principally occurs on the fringes of the urban areas, with implications for urban expansion onto productive land.  In this context, an alternate relief would be to re-insert a clause in Objective 22 to the following or similar effect: provide for rural residential development in appropriate locations

	Name	Provision as notified	Relief sought	Reasons for relief
8	<b>Proposed Amendments to Chapter 4.1 Regulatory policies – direction to district and regional plans</b>			
8.1	Whole chapter	<u>All proposed amendments</u>	<b>That the proposed amendments to Chapter 4.1 be deleted</b>	<p>The proposed amendments to regulatory policies would more properly be considered in the full review of the RPS scheduled in 2024.</p> <p>Additional reasons are as set out in respect of the objectives for each topic.</p>
8.2	Amendments to Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust, and fine particulate matter, <u>and reducing greenhouse gas emissions</u> – regional plans	<p>Regional plans shall include policies, <del>and/or</del> rules <u>and/or</u> methods that:</p> <p>(a) protect or enhance the <i>amenity values</i> of neighbouring areas from discharges of odour, smoke and dust; and</p> <p>(b) protect people’s health from discharges of dust, smoke and fine particulate matter; and</p> <p>(c) <u>support industry to reduce greenhouse gas emissions from industrial processes, and</u></p> <p>(d) <u>phase-out coal as a fuel source for domestic fires and large-scale generators by 2030.</u></p>	<p><b>That the amendments to Policy 2 be deleted</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>In respect of clause c), we are not clear why only one sector is singled out for support.</p> <p>In respect of clause d), we understand that coal may be used as a fuel source across diverse sectors (eg, schools, hospitals, meatworks); and that these may be subject to the ETS.</p> <p>We suggest that one region “going solo” on new regulatory settings (over and above the ETS) may result in perverse consequences (eg, activities transferring or “leaking’ to another region).</p>

	Name	Provision as notified	Relief sought	Reasons for relief
8.3	<u>Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure – district and regional plans</u>	<u>District and regional plans shall include objectives, policies, rules and/or methods to require that all new and altered transport infrastructure is designed, constructed, and operated in a way that contribute to reducing greenhouse gas emissions by:</u> (a) <u>Optimising overall transport demand;</u> (b) <u>Maximising mode shift from private vehicles to public transport or active modes; and</u> (c) <u>Supporting the move towards low and zero-carbon modes.</u>	<b>That Policy CC.1 be deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to the full RPS review in 2024.  Accepting the intent to optimise urban transport infrastructure, we point out that mode-shift is not a practical option in rural areas, nor for heavy vehicles.  As yet there are no EVs or hydrogen vehicles that can practically replace farm utes or other off-road vehicles. EV utes that are available in New Zealand do not have the towing capacity required and are two-wheel drive.
8.4	<u>Policy CC.2: Travel demand management plans – district plans</u>	<u>By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to provide <i>travel demand management plans</i> to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions.</u>	<b>That Policy CC.2 be deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	As for Policy CC.1

	Name	Provision as notified	Relief sought	Reasons for relief
8.5	<p><u>Policy CC.5: Avoiding increases in agricultural greenhouse gas emissions– regional plan</u></p>	<p><u>Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in gross greenhouse gas emissions from agriculture.</u></p> <p><b>Explanation</b>  <u>As agriculture is the second largest emitter of greenhouse gases in the Wellington Region, contributing 34 percent of the region’s greenhouse gas emissions, reducing emissions from the agricultural sector is critical to contribute to achieving Objective CC.3. While central government is taking the lead on the policy approach to reduce agricultural greenhouse gas emissions through the use of a pricing mechanism (the Emissions Trading Scheme), this policy sets a minimum expectation that there should be no increase in agricultural greenhouse gas emissions in the Wellington Region.</u></p> <p><u>As of 30 November 2022, regional councils are able to make rules to control the discharge of greenhouse gases having regard to the effects on climate change. A plan change process will determine the way in which Policy CC.5 is given effect to and will need to consider issues such as equity and the relationship with the national pricing approach for agricultural emissions.</u></p>	<p><b>That Policy CC.5 be deleted</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Federated Farmers note that Council have omitted to propose any “avoid increase” directives in respect of any other sectors.</p> <p>Instead, Policy 2 provides for support (in respect of industry); and Policy CC.1 refers to “contribute to reducing’ (in respect of transport).</p> <p>This omission is especially curious in the context of the Regional Greenhouse Gas Inventory<sup>56</sup>. That inventory shows that:</p> <ul style="list-style-type: none"> <li>• the largest real change in gross regional emissions in the period 2001-2019 was the 17% decrease in agricultural emissions, ie, nearly 20% reduction over 20 years</li> <li>• by contrast the largest real increase was in transport emissions</li> <li>• and the largest percentage increase was industry</li> </ul> <p>In respect of agricultural trends, Federated Farmers is not aware of any drivers which would point to a turnaround in that regional trend: if Council may have evidence to that effect, it should be tabled.</p> <p>If Council’s concern is to monitor regional trends and take action where trends are heading the wrong way, then the remedy (eg, as provided for in the NPS-FM) would be to undertake the necessary investigative and remedial actions – any such investigation should clearly be directed to transport and to industry.</p> <p>If however Councils intention is to regulate individual enterprises, then that proposal would more properly be considered in its entirety (not with ‘placeholders’ pre-empting changes to the RMA); and progressed at the national level (eg, in a similar way to the process</p>

<sup>56</sup> GWRC, 18 May 2020, Wellington Region Greenhouse Gas Inventory

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>followed for the development of nationally consistent policies, rules and requirements in respect of phasing out fossil fuels in process heat).</p> <p>Furthermore, any proposals to regulate farm emissions must equally be cognisant of farm carbon sequestration – the opportunity and challenge at farm-scale is two-fold and the optimal solutions are likely to be sensitive to both.</p> <p>We suggest that this policy may result in perverse outcomes, eg, landuse change from pastoral farming to other uses could see a reduction in short-lived agricultural emissions, but an increase in long-lived carbon dioxide emissions.</p> <p>In summary: this is a crude proposal which has not been thought through, which is not consistent with other policies, and which is not redeemed by the suggestion that the details will be sorted out later.</p>
8.6	<p>Policy CC.6: Increasing regional forest cover – regional plans</p> 	<p><u>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:</u></p> <p>(a) <u>promoting and incentivising the planting or regeneration of permanent indigenous forest over exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached, and</u></p>	<p><b>That Policy CC.6 be deleted</b></p> <p>Delete the FW icon.</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Defer to the full review of the RPS in 2024.</p> <p>This policy is pre-empting policy development which is in process at the national level, grappling with pines vis-à-vis natives, permanent vis-à-vis plantation, ETS vis-à-vis other settings for recognising carbon sequestration, and trees vis-à-vis other systems which sequester carbon (eg, wetlands, blue carbon).</p> <p>It is also the wrong tool for the job. To the extent Council seek to support increased tree planting, incentivise natives and hold soil on the hills, Federated Farmers is on board: indeed our members and Council staff have worked together on the ground for over 50 years to do exactly that. We can all take pride in the achievements resulting from that</p>



	Name	Provision as notified	Relief sought	Reasons for relief
		<p>(b) <u>avoiding plantation forestry on highly erodible land, particularly in catchments where water quality targets for sediment are not reached.</u></p> <p><b>Explanation</b>  <u>This policy recognises that, while there is a need for increased forest extent across the Wellington Region to help achieve net zero emissions by 2050, offsetting through carbon sequestration is only a short-term solution and that there are significant risks associated with unfettered afforestation across the region. The policy directs regional plans to develop provisions that will support “right tree-right place”, seeking to ensure that an increase in forest extent for its sequestration benefits will be implemented in a way that maximises the co-benefits for indigenous biodiversity and aquatic ecosystem health, and provide for social and economic well-being as directed by Objective CC.5.</u></p> <p><u>Clause (b) responds to the high risk of harvesting forest in areas that are highly erodible and in catchments where waterways already have high sediment loads. The National Environmental Standards for Plantation Forestry enables regional plans to regulate</u></p>		<p>long-standing partnership; and appreciate the recent significant increases in partnership funding from central government (eg, One Billion Trees, Jobs for Nature) to help accelerate the scale and pace of works.</p> <p>Federated Farmers submit that Council know what the real impediments are, and that the solutions will not be found in the rule book. For example, these extracts from Council documents:</p> <ul style="list-style-type: none"> <li>• “Natives slower growth rates and significantly higher planting costs create an implementation barrier to native forest establishment”<sup>57</sup></li> <li>• “The design of a package of policies that can deliver the amount and type of afforestation will be challenging and require effective incentives for landowners. Examples of successful initiatives are however limited”.<sup>58</sup></li> <li>• “Greater Wellington recommends that the Government considers an amendment to the ETS that monetises the benefits of indigenous forests compared to exotic forests”<sup>59</sup></li> <li>• “Protecting our soils and improving indigenous biodiversity are multi-generational commitments which need to be supported by long-term central government funding. Many parts of the tree planting supply chain require stability over many years and without reliable funding cycles, its capability cannot develop adequately to deliver on national reforestation goals. For example, plant supply, technology and skills for accelerated</li> </ul>

<sup>57</sup> GWRC, 21 April 2022, submission on Managing Exotic Afforestation Incentives Discussion Document

<sup>58</sup> GWRC submission on the Climate Change Commission 2021 Draft Advice

<sup>59</sup> GWRC, 1 June 2022, response to the National Draft Adaptation Plan and Managed Retreat Consultation

	Name	Provision as notified	Relief sought	Reasons for relief
		<u>plantation forestry for the purpose of protecting freshwater quality.</u>		<p>tree planting programmes, industry scale growth in seed collection, nursery services, fencing materials, landuse planning, contractor fencing, planting and site maintenance all require a stable market enabled by programmes and funding security of more than five years”<sup>60</sup></p> <ul style="list-style-type: none"> <li>• “For any permanent forest, the management regime is more critical for controlling adverse effects on the landscape, more so than the dichotomy of species selection, ie, native vs exotic”<sup>61</sup></li> <li>• “The use of exotic species is an essential need in the management of erosion prone land. In particular, willow and poplar species are likely to play a key role in the management of erosion risk for the foreseeable future in any silvo-pastoral landscape”<sup>62</sup></li> <li>• “We recommend that the Government find innovative ways to encourage the philosophy of ‘right tree, right place’ within the ETS, and think about ways to reward, via payment, greater care for biodiversity”<sup>63</sup></li> </ul> <p>LGNZ have made submissions to similar effect: “Establishing and maintaining indigenous native forest will be prohibitively expensive for landowners...financial incentives (rates rebates, subsidies, grants) and technical support will be required to increase native afforestation”<sup>64</sup></p>

<sup>60</sup> GWRC, Briefing to Incoming Ministers 2020/2021

<sup>61</sup> GWRC, 21 April 2022, submission on Managing Exotic Afforestation Incentives Discussion Document

<sup>62</sup> GWRC, 21 April 2022, submission on Managing Exotic Afforestation Incentives Discussion Document

<sup>63</sup> GWRC, 21 April 2022, submission on Managing Exotic Afforestation Incentives Discussion Document

<sup>64</sup> LGNZ, June 2022, submission on Aotearoa NZ’s First Emissions Reduction Plan

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>In short: the key issue is that the costs of establishment are an order of magnitude higher for natives; the returns are an order of magnitude lower; and the research and systems are not yet in place for rapidly increasing landscape plantings of natives in the short-term (including and especially in respect of natives for carbon).</p> <p>In respect of clause a: accepting Council's intent to incentivise natives – and acknowledging Council advocacy for increased central government partnership funding – we suggest a method to support and extend Council advocacy in this area. For example, one barrier is the stand-down period before landowners are eligible for carbon credits for grant funded forests<sup>65</sup>. Another is the practical barriers to transitioning existing exotic forests towards natives, given the current state of research into sequestration rates and the timing issues related to slower growth. A third issue is the challenge of addressing multiple environmental objectives through climate change mechanisms, ie, is there scope for a mechanism to credit native plantings for other values.</p> <p>We caution that binary definitions of ‘permanent’ and ‘plantation’ forest are at odds with international practice and emerging New Zealand practice, specifically “continuous canopy forestry” which provides for selective harvest while allowing a forest to be continually productive and carbon positive<sup>66</sup>.</p> <p>We also caution that binary assumptions about natives vs exotics – read “mono-cultural pines” – risk inadvertently shutting the door on a portfolio of</p>

<sup>65</sup> <https://www.legislation.govt.nz/act/public/2002/0040/latest/whole.html#LMS371238>


<sup>66</sup> <https://www.mpi.govt.nz/consultations/consultation-on-the-transformation-plan-for-the-forestry-and-wood-processing-industry/>

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>other species which are under active investigation at the national level<sup>67</sup>.</p> <p>In respect of clause b: the NES-Plantation Forestry already sets a very high consenting bar for “highly erodible land” (red zone): if Council has data showing that a great many (how many?) consents have been approved for plantation forestry in the red zone in this region since promulgation of the NES-PF, that should be tabled.</p> <p>Otherwise, we see no reason to ramp up the NES-PF with an “avoid” directive. We note that where councils propose more stringent rules, s32(4) of the RMA requires councils to examine whether this is justified in the circumstances of the region<sup>68</sup>: on our reading the s32 report does not address this obligation.</p> <p>Accepting that the NES-PF sets a high bar, nevertheless it does not prohibit activities, not least because the “red zone” relies only on very crude and low resolution mapping of LUC land classes (1:50,000); and there is scope for applicants to provide higher resolution local mapping of erosion risks.</p> <p>In that context, Council have advised that they do have higher resolution mapping (at 1:15,000 or 1:5000) for at least some parts of the region<sup>69</sup>: we suggest there may be merit in considering a method wherein Council make this information available to landowners on request– and perhaps catchment groups – to support understanding and targetting tree planting investments.</p>

<sup>67</sup> <https://www.mpi.govt.nz/consultations/consultation-on-the-transformation-plan-for-the-forestry-and-wood-processing-industry/>

<sup>68</sup> MPI, May 2018, NES for Plantation Forestry – User Guide


<sup>69</sup> Email communication 9 September 2022

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>Related to erosion risks, we are aware that the MBIE funded project “Smarter Targetting of Erosion Control” is nearing completion and is intended to provide a more robust method for estimating erosion risks: in this context, the RPS should not prematurely lock in the low-resolution LUC methodology.</p> <p>In relation to catchment sediment targets: we note these will be assessed in the upcoming 2023/2024 plan changes, and those plan changes will be the appropriate time to consider provisions to meet any such targets. To the extent we might anticipate that sediment targets might generally be set to improvement rather than maintenance, then the effect of this policy as currently written seems to be a blanket promotion of natives across the region, with no recognition of other species including species which are proven performers in erosion/sediment control, eg, space planted poplars.</p>
8.7	<p><u>Policy CC.7: Protecting, restoring and enhancing ecosystems that provide nature-based solutions to climate change – district and regional plans</u></p> 	<p><u>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.</u></p>	<p><b>That Policy CC.7 be deleted</b></p> <p>Delete the FW icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Defer to the full review of the RPS in 2024.</p> <p>We note the s32 report (pg 281) clarifies that “nature based solutions” will not be “significant natural areas” (SNAs) but that this statement is not explicitly made in the RPS Change One.</p> <p>We further note references in the s32 report to enabling nature based solutions: we concur with this concern, including with reference to regulatory roadblocks (eg, definitions of “wetlands” and “RMA rivers” which have the effect of presenting roadblocks to beneficial activities such as nature based solutions)</p>

	Name	Provision as notified	Relief sought	Reasons for relief
8.8	<u>Policy CC.8: Prioritising greenhouse gas reduction over offsetting – district and regional plans</u>	<u>District and regional plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply.</u>	<b>That Policy CC.8 be deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to the full review of the RPS in 2024
8.10	Amendments to Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans	District and regional plans shall include policies and/or methods that recognise:  (a) the social, economic, cultural and environmental benefits of <i>regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure</i> including:  (i) people and goods can travel to, from and around the region efficiently and safely <u>and in ways that support transitioning to low or zero carbon multi modal travel modes;</u>  (ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the	<b>That the amendments to Policy 7 be deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to the full review of the RPS in 2024  We note that Policy 7 and the definition of RSI include reference to municipal water supply and drinking water, but do not more widely recognise the critical role of water supply infrastructure across all regional sectors (including industry and primary production) and at all scales (regional, municipal, community, farm-scale).  In respect of primary production, a recent MPI report <sup>70</sup> starkly sets out the challenge and the opportunity: <ul style="list-style-type: none"> <li>• ‘Secure and reliable access to water is a necessary precondition for the integrity and resilience of rural and urban communities; and future investments in landuse, landuse change, and high value processing. It is also a key enabler for the transition to a lower emissions future’</li> <li>• ‘This will be significant to the future development of underutilised/unproductive Maori land and the associated supply chain requirements’</li> <li>• ‘Such shifts require reasonable investment certainty. Elevated risk/uncertainty impacts the ability to access capital...regulatory uncertainty over future changes to</li> </ul>

<sup>70</sup> <https://www.mpi.govt.nz/dmsdocument/47770-Water-Availability-and-Security-in-Aotearoa-New-Zealand>


	Name	Provision as notified	Relief sought	Reasons for relief
		<p>collection and transfer of sewage and stormwater, and the provision of emergency services;</p> <p>(iii) people have access to energy, <u>and preferably low or zero carbon energy</u>, so as to meet their needs; and</p> <p>(iv) people have access to telecommunication services.</p> <p>(b) the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</p> <p>(i) security of supply and diversification of our energy sources;</p> <p>(ii) reducing dependency on imported energy resources; and</p> <p>(iii) reducing greenhouse gas <i>emissions</i>.</p>		<p>availability and security further compounds these risks”</p> <ul style="list-style-type: none"> <li>• “NZ has a target of reaching 100% renewable electricity by 2035. While the main focus is likely to be on wind, geothermal and solar energy, there could be opportunities to integrate small and medium-scale hydro-generation as part of new water storage infrastructure”</li> </ul>



	Name	Provision as notified	Relief sought	Reasons for relief
8.11	Amendments to Policy 12: Management purposes for surface of water bodies – regional plans 	Regional plans shall <del>give effect to <i>Te Mana o te Wai</i> and include objectives, policies, rules and/or methods that:</del> <del>(a) require that water quality, flows and water levels, and the aquatic habitat of surface water bodies are to be managed for the purpose of safeguarding aquatic ecosystem health; and</del> <del>(b) manage water bodies for other purposes identified in regional plans.</del> (a) <u>are prepared in partnership with mana whenua / tangata whenua;</u> (b) <u>achieve the long-term visions for freshwater;</u> (c) <u>identify freshwater management units (FMUs);</u> (d) <u>identify values for every FMU and environmental outcomes for these as objectives;</u> (e) <u>identify target attribute states that achieve environmental outcomes, and record their baseline state;</u> (f) <u>set environmental flows and levels that will achieve environmental outcomes and long-term visions;</u> (g) <u>identify limits on resource use including take limits that will</u>	<b>That the amendments to Policy 12 be deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to full review of the RPS in 2024  In respect of partnerships, we note that councils across the region have sought clarification of how local authorities relate to the role of Crown as Treaty partner <sup>71</sup> ; and GWRC have made submissions to similar effect, ie: “Council notes its role specified in section 4 of the Local Government Act 2002 is to support the Crown as the Treaty partner “in order to recognise and respect the Crown’s responsibility to take appropriate account of the principles of the Treaty of Waitangi” <sup>72</sup> .  Pending any changes to the LGA 2002, any ‘partnership’ principles could and should be expressed more broadly to include the wider community.

<sup>71</sup> Joint submission on NBA Exposure Draft 2021 – GWRC, CDC, HCC, KCDC, PCC, UHCC, HDC


<sup>72</sup> GWRC submission on NBA Exposure Draft 2021





	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>achieve the target attribute states, flows and levels and include these as rules;</u></p> <p>(h) <u>identify non-regulatory actions that will be included in Action Plans that will assist in achieving target attribute states (in addition to limits); and</u></p> <p>(i) <u>identify non-regulatory and regulatory actions in Actions Plans required by the NPS-FM</u></p>		
8.12	<p>Amendments to Policy 15 <del>Minimising</del> Managing the effects of earthworks and vegetation disturbance – district and regional plans</p> 	<p>Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to <del>minimise</del> <u>the extent necessary to achieve the target attribute states for water bodies and freshwater ecosystems including the effects of these activities on the life-supporting capacity of soils, and to provide for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</u></p> <p><del>(a) — erosion; and</del></p> <p><del>(b) — silt and sediment runoff into water, or onto land that may enter water, aquatic ecosystem health is safeguarded.</del></p>	<p><b>That the amendments to Policy 15 be deleted</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>There are currently no limits for suspended sediment -or indeed any other attribute – in this region pending the upcoming plan changes in 2023 (urban) and 2024 (rural). The appropriate time to consider provisions for meeting any such limits will be in those plan changes.</p> <p>We are not clear why sediment has been singled out: to the extent the amendments are prompted by concern that the directives of the NPS-Urban Development may result in large-scale earthworks associated with housing and infrastructure, the remedy is not in this policy.</p> <p>Instead this policy would have region-wide effect: Federated Farmers record concern that earthworks and vegetation provisions were very recently the subject of mediated agreements in the pNRP hearings and we are not at all clear on the rationale for re-litigating these matters, even before the NRP is fully operative.</p>


	Name	Provision as notified	Relief sought	Reasons for relief
8.13	Amendments to Policy 17 <del>Water allocation Take</del> and use of water for the health needs of people – regional plans 	Regional plans shall include policies, rules and/or methods <del>to ensure the</del> <del>allocation that prioritises the health and</del> <del>wellbeing of the waterbody and</del> <del>freshwater ecosystems first, and then</del> <del>prioritises any take and use of water</del> <del>from any river or groundwater source</del> <del>provides sufficiently for the health needs</del> <del>of people., including:</del> <u>The health needs</u> <u>of people include:</u> (a) the taking of water by any statutory authority that has a duty for public water supply under any Act of Parliament; (b) the taking of water for reticulation into a public water supply network; (c) the taking of water for community supplies; <u>and</u> (d) <u>the taking of water for marae.</u>	<b>That the amendments to Policy 17 be            deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to full review of the RPS in 2024.  We note that the health needs of people (drinking water and basic sanitation) are only a portion of municipal takes: as currently written, the policy implies all takings of water by statutory authorities.
8.14	Amendments to Policy 18: Protecting <del>aquatic and</del> <del>restoring ecological function</del> <del>health of water bodies –</del> regional plans 	Regional plans shall include policies, rules and/or methods that <u>protect and</u> <del>restore the ecological health of water</del> <del>bodies, including:</del> (a) <u>managing freshwater in a way</u> <u>that gives effect to Te Mana o te</u> <u>Wai;</u> (b) <u>actively involve mana whenua /</u> <u>tangata whenua in freshwater</u> <u>management (including decision-</u> <u>making processes), and Māori</u> <u>freshwater values are identified</u> <u>and provided for;</u> (c) <u>there is no further loss of extent</u>	<b>That the amendments to Policy 18 be            deleted</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns	Defer to full review of the RPS in 2024

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>of natural inland wetlands and coastal wetlands, their values are protected, and their <i>restoration</i> is promoted;</u></p> <p><u>(d) achieving environmental outcomes, target attribute states and environmental flows and levels;</u></p> <p><u>(e) avoiding the loss of river extent and values;</u></p> <p><u>(f) protecting the significant values of outstanding water bodies;</u></p> <p><u>(g) protecting the habitats of indigenous freshwater species are protected;</u></p> <p><u>(h) Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;</u></p> <p><u>(i) promoting the retention of in-stream habitat diversity by retaining natural features – such as pools, runs, riffles, and the river’s natural form;</u></p> <p><u>(j) promoting the retention of natural flow regimes – such as flushing flows;</u></p> <p><u>(k) promoting the protection and reinstatement of riparian habitat;</u></p> <p><u>(l) promoting the installation of off-line water storage;</u></p> <p><u>(m) measuring and evaluating water takes;</u></p> <p><u>(n) discourage restricting the</u></p>		

	Name	Provision as notified	Relief sought	Reasons for relief
		<p>reclamation, piping, straightening or concrete lining of rivers;</p> <p><u>(o)</u> <del>discourage restricting stock access to estuaries, rivers, lakes and wetland;</del></p> <p><u>(p)</u> <del>discourage restricting the diversion of water into or from wetlands – unless the diversion is necessary to restore the hydrological variation to the wetland;</del></p> <p><u>(q)</u> <del>discourage restricting the removal or destruction of indigenous plants in wetlands and lakes; and</del></p> <p><u>(r)</u> <u>restoring and maintaining fish passage.</u></p>		
8.15	<p><b>Policy FW.1 Reducing water demand – regional plans</b></p> 	<p><u>Regional plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including:</u></p> <p><u>(a)</u> <u>provisions addressing public and private water losses, including leaks;</u></p> <p><u>(b)</u> <u>provisions requiring efficient end use of water for new developments;</u></p> <p><u>(c)</u> <u>provisions addressing alternate water supplies for non-potable uses, particularly in the summer months; and</u></p> <p><u>(d)</u> <u>water conservation measures, particularly in the summer months.</u></p>	<p><b>That Policy FW.1 be deleted</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Defer to full review of the RPS in 2024</p> <p>We note that provisions in respect of these same matters were very recently the subject of mediated agreements during the pNRP hearing. We are not clear on the rationale for re-litigating them in RPS Change One.</p>

	Name	Provision as notified	Relief sought	Reasons for relief
8.16	<p><b>Policy FW.2 Reducing water demand – district plans</b></p> 	<p><u>District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable:</u></p> <p>(a) <u>provisions improving the efficiency of the end use of water on a per capita basis for new developments; and</u></p> <p>(b) <u>provisions requiring alternate water supplies for non-potable use in new developments.</u></p>	<p><b>That Policy FW.2 be deleted</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	As for Policy FW.1
8.17	<p>Amendments to Policy 23 Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans</p> 	<p><u>By 30 June 2025, D</u>district and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:</p> <p>(a) Representativeness: the ecosystems or habitats that are typical and characteristic examples of the full range of the original or current natural diversity of ecosystem and habitat types in a district or in the region, and:</p> <p>(i) are no longer commonplace (less than about 30% remaining); or</p> <p>(ii) are poorly represented in existing protected areas</p>	<p><b>That the amendments to Policy 23 be deleted</b></p> <p>Delete the FW icon.</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	The case for urgent identification and evaluation of habitats with significant indigenous biodiversity values by 30 June 2025 has not been made: we suggest it is likely to be a waste of effort and resources doing such assessment in advance of a National Policy Statement on Indigenous Biodiversity.

	Name	Provision as notified	Relief sought	Reasons for relief
		<p>(less than about 20% legally protected).</p> <p>(b) Rarity: the ecosystem or habitat has biological or physical features that are scarce or threatened in a local, regional or national context. This can include individual species, rare and distinctive biological communities and physical features that are unusual or rare.</p> <p>(c) Diversity: the ecosystem or habitat has a natural diversity of ecological units, ecosystems, species and physical features within an area.</p> <p>(d) Ecological context of an area: the ecosystem or habitat:</p> <p>(i) enhances connectivity or otherwise buffers representative, rare or diverse indigenous ecosystems and habitats; or</p> <p>(ii) provides seasonal or core habitat for protected or threatened indigenous species.</p> <p><u>Mana whenua / t̄angata whenua</u> values: the ecosystem or habitat contains characteristics of special spiritual, historical or cultural significance to <u>mana whenua / tangata whenua</u>, identified in accordance with tikanga Māori.</p>		

	Name	Provision as notified	Relief sought	Reasons for relief
8.18	Amendments to Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans 	<p>By 30 June 2025, District and regional plans shall include policies, rules and methods to <i>protect</i> indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development.</p> <p><u>Where the policies and/or rules in district and regional plans enable the use of <i>biodiversity offsetting</i> or <i>biodiversity compensation</i> for an ecosystem or habitat with significant indigenous biodiversity values, they shall:</u></p> <p>(a) <u>not provide for <i>biodiversity offsetting</i>:</u></p> <p>(i) <u>where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or</u></p> <p>(ii) <u>when an activity is anticipated to causes residual adverse effects on an area after an offset has been implemented if the ecosystem or species is <i>threatened</i> or the ecosystem is <i>naturally uncommon</i>;</u></p> <p>(b) <u>not provide for <i>biodiversity compensation</i> where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is</u></p>	<p><b>That the amendments to Policy 24 be deleted</b></p> <p>Delete the freshwater icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>These matters have very recently been the subject of mediated agreements during the pNRP Hearing: we are not clear on the rationale for re-litigating them in RPS Change One.</p> <p>The s32 Report (pg 191, 194, 196) explains that Council intent is to provide for a "regional" interpretation of offsets, which is "precautionary", and which is "more ambitious" than the exposure draft of the NPS-IB. We reiterate the inefficiency of second-guessing national instruments and litigating the same issues at the same time at both national and regional level.</p> <p>On our reading the effect of the proposed amendments is almost a blanket prohibition on offsets. If we have misunderstood the intention and effect, it would be helpful to understand what is intended by "a residual adverse effect"; and to see high resolution maps (by whitua) depicting the areas (across the multiple ecosystem types) intended to be ineligible for offsets. Alternatively, it may be a simpler task to document/map those systems/areas which <u>are</u> eligible for offsets.</p> <p>We record concern that the effect may be significantly at odds with aspirations to increase "nature based solutions" (NBS), eg, creating or restoring wetlands. Again if we have misunderstood the intent and application, it would be helpful to understand where wetland NBS would be located if seepages, flushes, ephemeral wetlands, any wetlands which may contain one 'vulnerable' wetland species or areas where grey duck are in the vicinity, are not eligible.</p> <p>Similarly in respect of forest types, it seems the effect may be that offsets cannot be proposed in any forest remnants outside the Tararuas. For example,</p>

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>threatened or the ecosystem is naturally uncommon;</u></p> <p>(c) <u>ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation);</u></p> <p>(d) <u>require that the outcome sought from the use of biodiversity offsetting is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit.</u></p>		<p>the Ruamahanga whitua has nearly 4,000 hectares of “totara/titoki” forest<sup>73</sup> which would not be eligible for offset proposals. In the context that Council sees pest control (both animal and plant) as the “key management activity required to maintain forest biodiversity”<sup>74</sup>, it seems an odd proposition to shut the door on offsets which could help make those investments in active management; and which could also deliver improved carbon sequestration values in our existing forest systems.</p> <p>This is especially baffling in the context of a recent Council report making the case for restoration of forest areas: “In addition to protecting the best examples of these ecosystems that remain, we also need to recover their extent...this requires prioritised restoration plans to achieve the best outcome with the opportunities and resources available”<sup>75</sup>.</p> <p>Or another Council report also making the case for prioritising the best-bang-for-buck investments: “The goal is to identify the best remaining sites for selection within the KNE programme and investment through active management...the best most ecologically intact sites are chosen for management because it is more cost-effective to maintain or enhance ecosystems with high ecological integrity (i.e. in good ecological condition) than to restore degraded ecosystems”<sup>76</sup></p> <p>In respect of coastal communities (and associated bird species, eg, dotterel, Caspian tern), we are aware of multiple community groups making best</p>

<sup>73</sup> <https://www.gw.govt.nz/assets/Documents/2022/03/Forest-ecosystem-restoration-opportunities-in-the-Wellington-region.pdf>

<sup>74</sup> <https://www.gw.govt.nz/assets/Documents/2022/03/Biodiversity-Thinkpiece-June-2020.pdf>

<sup>75</sup> <https://www.gw.govt.nz/assets/Documents/2022/03/Forest-ecosystem-restoration-opportunities-in-the-Wellington-region.pdf>

<sup>76</sup> <https://www.gw.govt.nz/document/995/identification-and-prioritisation-of-high-value-terrestrial-biodiversity-sites-for-selection-within-the-key-native-ecosystems-programme-in-the-wellington-region>




	Name	Provision as notified	Relief sought	Reasons for relief
				<p>efforts to stabilise sand-dune habitats and look after threatened birds but on our reading, offsets may not be proposed in “active sand dunes” or “stable sand dunes”. In the context some of these community groups may appreciate a “shot in the arm”, it seems odd to exclude the possibility of support through offset initiatives.</p> <p>In respect of naturally uncommon ecosystems, the “Thresholds of Concern” report (pg 3) relies on referencing Holdaway et al 2012 but omits to mention that the threat classifications in that Holdaway paper were presented as “preliminary assessments”. In subsequent discussion with LandcareResearch, it was confirmed that those 2012 assessments were based on sketchy data, and that the key issue is undertaking the proper fieldwork to understand the distribution of those ecosystem types<sup>77</sup>. It is our understanding that similar issues of limited data bedevil Threatened Species Classifications.<sup>78</sup> The key point arising is the need for ground-truthed regional survey data (eg, as directed by NRP Method M20A in respect of the Coastal Marine Area).</p> <p>We also record concern that Council propose shutting the door on innovation, ie, if it’s not tried and tested, it can’t be contemplated. For example, a recent Council report references research in progress at Wairarapa Moana “to determine if it is possible to maintain low introduced fish numbers in lake-edge wetlands in order to allow native fish communities to re-populate that habitat. This work shows promise and continuing to find ways to improve outcomes for aquatic faunal communities is a priority”.<sup>79</sup> Again it</p>


<sup>77</sup> Email correspondence (Wiser/Holdaway), 1 July 2020


<sup>78</sup> Email correspondence (Rolfe), 6 March 2020


<sup>79</sup> <https://www.gw.govt.nz/assets/Documents/2022/03/Biodiversity-Thinkpiece-June-2020.pdf>

	Name	Provision as notified	Relief sought	Reasons for relief
				<p>seems short-sighted to shut the door on offset partners supporting initiatives such as these.</p> <p>In summary: on our current reading, the effect of this policy is that offsets may practically be restricted to areas which are “lower value” and “lower priority” for enhancement or restoration initiatives which seems a counter-intuitive and short-sighted approach.</p>
8.19	<p><u>Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – regulatory</u></p> 	<p><u>District and regional plans shall include objectives, policies, methods and/or rules to partner with mana whenua / tangata whenua to:</u></p> <p>(a) <u>apply mātauranga Māori frameworks, and support mana whenua / tangata whenua to exercise their kaitiakitanga, in managing and monitoring indigenous biodiversity;</u></p> <p>(b) <u>identify and protect taonga species;</u></p> <p>(c) <u>support mana whenua / tangata whenua to access and exercise sustainable customary use of indigenous biodiversity, including for mahinga kai and taonga, in accordance with tikanga.</u></p>	<p><b>That the amendments to Policy IE.1 be deleted</b></p> <p>Delete the freshwater icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Defer to full review of the RPS in 2024</p> <p>The reference to “partner” is not supported for the reasons set out in Policy 12</p>
8.20	<p>Amendments to Policy 29: <u>Avoiding inappropriate Managing subdivision, use and development in areas at high risk from natural hazards – district and regional plans</u></p>	<p>Regional and district plans shall:</p> <p>(a) <u>identify areas affected by natural hazards; and</u></p> <p>(b) <u>use a risk-based approach to assess the consequences to</u></p>	<p><b>That the amendments to Policy 29 be deleted</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Defer to full review of the RPS in 2024</p> <p>This area was the subject of recent mediation in the pNRP hearings and the rationale for re-litigating in RPS Change One is not clear.</p>

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>subdivision, use and development from natural hazard and climate change impacts over a 100 year planning horizon;</u></p> <p>(c) <u>include objectives, polices and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and</u></p> <p>(d) <u>include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.</u></p>		

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9	<b>Proposed amendment to Chapter 4.2 Regulatory Policies – consideration</b>			
9.1	Whole chapter	<u>All proposed amendments</u>	<b>That the proposed amendments to Chapter 4.2 be deleted</b>	The proposed amendments to regulatory policies would more properly be considered in the full review of the RPS scheduled in 2024.  Additional reasons are as set out in respect of the objectives for each topic.
9.2	<u>Policy IM.1: Integrated management - ki uta ki tai – consideration</u> 	<u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be given to:</u> (a) <u>partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua involvement in resource management and decision making; and</u> (b) <u>recognising the interconnectedness between air, freshwater, land, coastal marine areas, ecosystems and all living things – ki uta ki tai; and</u> (c) <u>recognising the interrelationship between natural resources and the built environments; and</u> (d) <u>making decisions based on the best available information, improvements in technology and science, and mātauranga Māori; and</u> (e) <u>upholding Māori data sovereignty; and</u> (f) <u>requiring Māori data and mātauranga Māori to be interpreted within Te Ao Māori; and</u>	<b>That Policy IM.1 be deleted</b>  Delete the FW icon.  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.	As set out in our reasons in respect of amendments to Chapter 3 – over-arching issues and objectives.  The reference to “partner” is not supported for the reasons set out in Policy 12.

	Name	Provision as notified	Relief sought	Reasons for relief
		(g) <u>recognising that the impacts of activities may extend beyond immediate and directly adjacent area, and beyond organisational or administrative boundaries</u>		
9.3	<u>Policy IM.2 Equity and inclusiveness – consideration</u> 	<u>When considering an application for a notified resource consent, notice of requirement, or a change, variation or review of a regional and district plan particular regard shall be given to achieving the objectives and policy outcomes of this RPS in an equitable and inclusive way, by:</u> (a) <u>avoiding compounding historic grievances with iwi/Māori; and</u> (b) <u>not exacerbating existing inequities, in particular but not limited to, access to public transport, amenities and housing; and</u> (c) <u>not exacerbating environmental issues; and</u> (d) <u>not increasing the burden on future generations.</u>	<b>That Policy IM.2 be deleted.</b>  Delete the FW icon.  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.	The purpose and principles of the RMA do not require considerations of ‘equity’ or ‘inclusiveness’ when considering plan changes or resource consent applications; and would practically be unworkable, especially at the level of resource consents.  Related to this, we suggest that public policy is not well served by introducing concepts which have not been defined – our understanding is that these terms mean qualities of impartiality across different types of people, others may have alternate understandings - and which seem to rely on addressing issues which are assumed but not necessarily well documented in RPS Change One, for example, in respect of transport “inequities”.  As set out in our reasons in Chapter 3.1A, a key issue in equitable transition policies will be providing for realistic and affordable alternatives across community sectors, including in rural areas  In addition to the uncertainties introduced by these concepts, we question the intent of the policy; on its face it seems to be intended to relate to climate change objectives; but as written it is not limited to application in that context.
9.4	<u>Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure – consideration</u>	<u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard</u>	<b>That Policy CC.9 be deleted.</b>	This policy is inappropriate for rural production and rural living areas where public transport or ‘active modes’ are non-existent. Requiring this policy to apply to such land would serve no purpose other than to require additional assessment for these


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		<p><u>shall be given to whether the subdivision, use and development have been planned to optimise overall transport demand, maximising mode shift from private vehicles to public transport or active modes, in a way that contributes to reducing greenhouse gas emissions.</u></p>	<p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>matters that would produce the same conclusion i.e., that public transport or ‘active modes’ are non-existent or impractical in rural areas.</p>
9.5	<p><u>Policy CC.11: Encouraging whole of life carbon emissions assessment – consideration</u></p>	<p><u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, a whole of life carbon emissions assessment is encouraged for all new or altered transport infrastructure as part of the information submitted with the application. This information will assist with evaluating the potential greenhouse gas emissions, options for reducing direct and indirect greenhouse gas emissions and whether the infrastructure has been designed and will operate in a manner that contributes to the regional target for a reduction to transport-related greenhouse gas emissions.</u></p>	<p><b>That Policy CC.11 be deleted.</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>As for Policy CC.9</p>
9.6	<p><u>Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change – consideration</u></p> 	<p><u>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 particular regard shall be given to avoiding adverse</u></p>	<p><b>That Policy CC.12 be deleted</b></p> <p>Delete the FW icon.</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>We note that 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.</p> <p>To the extent, Council intent is look after the trees (and wetlands etc), we suggest these are already</p>

	Name	Provision as notified	Relief sought	Reasons for relief
		effects on the <i>climate change mitigation or adaptation</i> functions.		comprehensively covered by existing regional and national RMA instruments.
9.7	Policy CC.13: Managing agricultural gross greenhouse gas emissions – consideration	<p><u>When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to:</u></p> <p>(a) <u>reducing gross greenhouse gas emissions as a priority where practicable, and</u></p> <p>(b) <u>where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and</u></p> <p>(c) <u>avoiding any increase in gross greenhouse gas emissions.</u></p> <p><b><u>Explanation</u></b>  <u>As agriculture is the second largest emitter of GHG in the region, contributing 34 percent of the region’s GHG emissions, reducing emissions from this sector is critical to contribute to achieving Objective CC.3. As of 30 November 2022, consent authorities may have regard to the effects of discharges into air of greenhouse gases on climate change in considering an application for a discharge permit or coastal permit. Where resource consent is required in association with a change in land use intensity or type of agricultural land use, the policy requires</u></p>	<p><b>That Policy CC.13 be deleted</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>Reasons as set out in respect of the proposed climate change objectives and Policy CC.5</p> <p>We note that the directive in Policy CC.9 is expressed in terms of optimising planned developments in a way that contributes to reducing emissions (in respect of transport infrastructure); and that Policy 2 is expressed in terms of support (in respect of industry): we are not clear why Policy CC.13 is expressed in different terms.</p>



	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>a hierarchy of effort, seeking to reduce gross greenhouse gas emissions in the first instance, followed by achieving a net reduction, with a minimum expectation that any increase in gross emissions is avoided.</u></p>		
9.8	<p><u>Amendments to Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration</u></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:</p> <p>(a) the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or <i>regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions</i>; and</p> <p>(b) protecting <i>regionally significant infrastructure</i> from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and</p> <p>(c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and</p> <p>(d) significant wind, <u>solar</u> and marine renewable energy resources within the region.</p>	<p><b>That the amendments to Policy 39 be deleted.</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>Reasons as set out in respect of Policy 7, including those cited in a recent MPI report<sup>80</sup> setting out the challenge for availability and reliability of water imposed by climate change (and compounded by regulatory settings)</p> <p>We note the amendments do not provide for the social, economic, cultural, and environmental benefits of water storage infrastructure, in particular where it contributes to security of supply for municipal, industrial and primary production uses.</p>
9.9	<p>Amendments to Policy 40: <del>Maintaining</del> <u>Protecting and</u></p>	<p>When considering an application for a <u>regional</u> resource consent, particular regard shall be given to:</p>	<p><b>That the amendments to Policy 40 be deleted.</b></p>	<p>Reasons as set out in respect of the proposed objectives for freshwater.</p>

<sup>80</sup> <https://www.mpi.govt.nz/dmsdocument/47770-Water-Availability-and-Security-in-Aotearoa-New-Zealand>




	Name	Provision as notified	Relief sought	Reasons for relief
	<p>enhancing the health and well-being of water bodies and freshwater ecosystems aquatic ecosystem health in water bodies – consideration</p> 	<p>a) <del>requiring</del> that water quality, flows and water levels and aquatic habitats of <del>surface</del> water bodies are managed <u>in a way that gives effect to <i>Te Mana o Te Wai</i> and protects and enhances the health and well-being of waterbodies and the health and wellbeing of freshwater ecosystems for the purpose of safeguarding aquatic ecosystem health;</u></p> <p>b) that, <del>requiring</del> as a minimum, water quality in the <i>coastal marine area</i> <del>is to be managed in a way that protects and enhances the health and well-being of waterbodies and the health and wellbeing of marine ecosystems; for the purpose of maintaining or enhancing aquatic ecosystem health; and</del></p> <ul style="list-style-type: none"> <li>• <del>managing water bodies and the water quality of coastal water for other purposes identified in regional plans.</del></li> </ul> <p>c) <u>providing for mana whenua / tangata whenua values, including mahinga kai;</u></p> <p>d) <u><i>maintaining</i> or enhancing the functioning of ecosystems in the water body;</u></p> <p>e) <u><i>maintaining</i> or enhancing the ecological functions of riparian margins;</u></p> <p>f) <u>minimising the effect of the proposal on groundwater recharge areas that are</u></p>	<p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	


	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>connected to surface water bodies;</u></p> <p>g) <u><i>maintaining</i> or enhancing the amenity and recreational values of rivers and lakes, including those with significant values listed in Table 15 of Appendix 1;</u></p> <p>h) <u>protecting the significant indigenous ecosystems and habitats with significant indigenous biodiversity values of rivers and lakes, including those listed in Table 16 of Appendix 1;</u></p> <p>i) <u><i>maintaining</i> natural flow regimes required to support aquatic ecosystem health;</u></p> <p>j) <u><i>maintaining</i> or enhancing space for rivers to undertake their natural processes;</u></p> <p>k) <u><i>maintaining</i> fish passage;</u></p> <p>l) <u>protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning;</u></p> <p>m) <del>discouraging</del> <u>restricting stock access to estuaries rivers, lakes and wetlands; and</u></p> <p>n) <del>discouraging</del> <u>avoiding the removal or destruction of indigenous wetland plants in wetlands.</u></p> <p><b>Explanation</b>  <u>Policy 40 provides criteria for considering regional consents to protect the health</u></p>		


	Name	Provision as notified	Relief sought	Reasons for relief
9.10	Amendments to Policy 41 <del>Minimising Controlling</del> the effects of earthworks and vegetation disturbance – consideration 	<del>and wellbeing of waterbodies, particularly during the transition period before regional plans are changed to give effect to the NPS-FM.</del> When considering an application for a resource consent, <del>notice of requirement, or a change, variation or review of a regional or district plan,</del> particular regard shall be given to controlling earthworks and vegetation disturbance <del>by to</del> <u>minimise:</u> <del>–erosion; and</del> a) <u>considering whether the activity will achieve environmental outcomes and target attribute states; silt and sediment runoff into water, or onto or into land that may enter water, so that healthy aquatic ecosystems are sustained; and</u> b) <u>avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.</u>	<b>That the amendments to Policy 41 be deleted.</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.	Defer to the full review of the RPS in 2024; and/or the NRP changes scheduled in 2023 and 2024, for reasons as set out in respect of Policy 15.  As currently written, this provision references “controlling’ in the title, “minimising’ in the explanation, and “avoiding’ in the body.  On our reading, the latter is the intent and - to the extent that when targets and limits are set in the upcoming plan changes and may generally seek a modest or ambitious level of improvement from current state – the effect may amount to a blanket prohibition on earthworks and vegetation disturbance across the region.
9.11	<b>Amendments to Policy 44</b> Managing water takes <del>and use to give effect to Te Mana o te Wai ensure efficient use</del> – consideration 	When considering an application for a resource consent, <del>notice of requirement, or a change, variation or review of a regional plan to take and use water, Te Mana o te Wai must be given effect to</del> so that: <del>particular regard shall be given to:</del> (a) <u>Māori freshwater values, including mahinga kai are provided for;</u> (b) <u>sites of significance, wāhi tapu and wāhi tupuna are protected;</u>	<b>That the amendments to Policy 44 be deleted.</b>  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.	As set out in relation to objectives for freshwater.  To the extent any amendments are made, they should not apply to s14(3) takes  We are unclear on Councils intent in proposing new clause (h), ie, requiring consideration of water storage, including in resource consents.  To the extent Council concern relates to growing demands for water consequent to urban development and population growth (and our

	Name	Provision as notified	Relief sought	Reasons for relief
		<p>(c) <u>Environmental flows and levels, including variability of flows, are achieved;</u></p> <p>(d) <u>Take limits are achieved that provide for flow or level variability, safeguard ecosystem health, provide for the life cycle needs of aquatic life, and take into account environmental outcomes;</u></p> <p>(e) <del>whether</del> the applicant has demonstrated that the volume of water sought is reasonable and justifiable for the intended use, including consideration of soil and crop type when water is taken for irrigation purposes;</p> <p>(f) requiring the consent holder to measure and report the actual amount of water taken; <del>and</del></p> <p>(g) requiring the consent holder to adopt water conservation and demand management measures and demonstrate how water will be used efficiently; <u>and</u></p> <p>(h) <u>there is consideration of alternate water supplies such as storage or capture of rainwater for use during the drier summer months</u></p> <p><b>Explanation</b> Efficient water use relies on people taking only the amount of water that is needed  and having systems in place to avoid waste. The amount of water taken should be measured and reported on to allow assessment as to whether</p>		<p>reading of proposed Policy FW.5 would support that interpretation) the application of that clause could be specific to municipal takes.</p> <p>To the extent Council may seek to impose requirements to store water more widely via individual consents, then any such proposal should be accompanied by strongly enabling provisions (much stronger than proposed Policy FW.7) and supported by rigorous cost-benefit analysis, including analysis of the bang-for-buck on investment at small or larger scales.</p> <p>Federated Farmers record concern that – if the latter is Councils intent – then this would be an unacceptably casual approach to a critically important matter for the primary production sector across the region.</p> <p>Alternatively, our proposed new over-arching Objective B is intended to provide a pathway towards a similar result.</p> <p>.</p> <p>.</p>

	Name	Provision as notified	Relief sought	Reasons for relief
		allocation limits and permissible low flows have been set at appropriate levels. <u>Appropriate consideration of mana whenua values has been added.</u> <u>Consideration of alternative water supplies is also required.</u>		
9.12	<p><u>Policy FW.5: Water supply planning for climate change and urban development – consideration</u></p> 	<p><u>When considering a change, variation or review of a regional or district plan particular regard shall be given to:</u></p> <p>(a) <u>climate change impacts on water supply, including water availability and demand;</u></p> <p>(b) <u>demand from future population projections;</u></p> <p>(c) <u>development of future water sources, storage, treatment and reticulation; and</u></p> <p>(d) <u>protection of existing and future water sources.</u></p>	<p><b>That Policy FW.5 be deleted.</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>Reasons as set out in respect of freshwater objectives.</p> <p>We note the intent appears to be restricted to a concern for urban supplies and urban growth projections – and not rural supplies and primary production values.</p> <p>The critical importance of water for primary production – in the face of challenges from both climate change and regulatory settings – is set out in a recent MPI report<sup>81</sup>, including that:</p> <ul style="list-style-type: none"> <li>• ‘Globally, irrigated land produces 40% of food production off 20% of cultivated land and the pattern of much higher production of irrigated land compared with ‘rainfed’ land will be similar in NZ”</li> <li>• “Secure and reliable access to water is a necessary precondition for most future investments in land use change, high value processing, and for reducing exposure to drought and climate-related events”</li> </ul> <p>Our proposed over-arching Objective B is intended to provide a pathway towards a similar result.</p>
9.13	Amendments to Policy 47: Managing effects on indigenous ecosystems and habitats with	When considering an application for a resource consent, notice of requirement, or a change, variation or review of a	<b>That the amendments to Policy 47 be deleted.</b>	The amendments to Policy 47 are principally to add clause i) referencing Policy 24 (offsets) – our reasons are set out there.

<sup>81</sup> <https://www.mpi.govt.nz/dmsdocument/47770-Water-Availability-and-Security-in-Aotearoa-New-Zealand>


	Name	Provision as notified	Relief sought	Reasons for relief
	significant indigenous biodiversity values – consideration 	<p>district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity values, and in determining whether the proposed activity is inappropriate particular regard shall be given to:</p> <p>(a) <i>maintaining</i> connections within, or corridors between, habitats of indigenous flora and fauna and/or enhancing the connectivity between fragmented indigenous habitats;</p> <p>(b) providing adequate buffering around areas of significant indigenous ecosystems and habitats from other land uses;</p> <p>(c) managing wetlands for the purpose of aquatic <i>ecosystem health</i>, <u>recognising the wider benefits, such as for indigenous biodiversity, water quality and holding water in the landscape</u>;</p> <p>(d) avoiding the cumulative adverse effects of the incremental loss of indigenous ecosystems and habitats;</p> <p>(e) providing seasonal or core habitat for indigenous species;</p> <p>(f) <i>protecting</i> the life supporting capacity of indigenous ecosystems and habitats;</p> <p>(g) <del>remedying or mitigating</del> <u>minimising or remedying</u> adverse effects on the indigenous biodiversity values where avoiding</p>	<p>Delete the FW icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	


	Name	Provision as notified	Relief sought	Reasons for relief
		<p>adverse effects is not practicably achievable; <del>and</del></p> <p>(h) the need for a precautionary approach when assessing the potential for adverse effects on indigenous ecosystems and habitats;</p> <p>(i) <u>the limits to and expected outcomes from <i>biodiversity offsetting</i> and <i>biodiversity compensation</i> set out in Policy 24.</u></p>		
9.14	<p><u>Policy IE.2: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – consideration</u></p> 	<p><u>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, particular regard shall be given to enabling mana whenua / tangata whenua to exercise their role as kaitiaki, including, but not restricted to:</u></p> <p>(a) <u>providing for mana whenua / tangata whenua values associated with indigenous biodiversity, including giving local effect to <i>Te Rito o te Harakeke</i>,</u></p> <p>(b) <u>incorporating the use of mātauranga Māori in the management and monitoring of indigenous biodiversity; and</u></p> <p>(c) <u>supporting mana whenua / tangata whenua to access and exercise sustainable customary use of indigenous biodiversity, including for mahinga kai and taonga, in accordance with tikanga.</u></p>	<p><b>That Policy IE.2 be deleted.</b></p> <p>Delete the FW icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>We suggest it is hugely inefficient to require that particular regard be given to exercise of mana whenua / tangata whenua role as kaitiaki for individual resource consent applications.</p>


	Name	Provision as notified	Relief sought	Reasons for relief
9.15	Amendments to Policy 51: Minimising the risks and consequences of natural hazards – consideration	<p>When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to:</p> <p>(a) <del>the frequency and magnitude</del> <u>likelihood and consequences</u> of the range of natural hazards that may adversely affect the <del>proposal or development</del> <u>subdivision, use or development, including residual risk those that may be exacerbated by climate change and sea level rise,</u></p> <p>(b) <del>the potential for climate change and sea level rise to increase in the frequency or magnitude of a hazard event;</del></p> <p>(c) whether the location of the <u>subdivision, use or development</u> will foreseeably require hazard mitigation works in the future;</p> <p>(d) the potential for injury or loss of life, <u>social and economic</u> disruption and civil defence emergency management implications – such as access routes to and from the site;</p> <p>(e) <u>whether the subdivision, use or development causes any change in the risk and consequences from natural hazards in areas beyond</u></p>	<p><b>That the amendments to Policy 51 be deleted.</b></p> <p>To the extent amendments to Policy 51 are made, delete the FW icon.</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>To the extent Council concern relates principally to future-proofing urban developments (high density, high capital and often located alongside the coast or major rivers), then that should be specified in the policy.</p> <p>We note that certain types of subdivision (e.g. boundary relocation where no additional lots are being created) or temporary, or time-limited use or development may still be appropriate in high risk areas where land can be efficiently used for some useful purpose, ie, the default position should not be to avoid all subdivision use or development in these areas.</p>





	Name	Provision as notified	Relief sought	Reasons for relief
		<p>the application site;</p> <p>(f) <u>minimising effects on the impact of the proposed subdivision, use or development on any natural features that may act as a buffer to <del>or reduce the impacts of a</del> from natural hazards event; and where development should not interfere with their ability to reduce the risks of natural hazards;</u></p> <p>(g) <u>avoiding inappropriate subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme; in areas at high risk from natural hazards;</u></p> <p>(h) <u>appropriate hazard risk management and/or adaptation and/or mitigation measures for subdivision, use or development in areas where the hazards and risks are assessed as low to moderate hazard areas, including an assessment of residual risk; and</u></p> <p>(i) <u>the allowance for floodwater conveyancing in identified overland flow paths and stream corridors; and</u></p> <p>(j) <u>the need to locate habitable floor areas levels of habitable buildings and buildings used as places of employment above the 1% AEP (1:100 year) flood level, in identified flood hazard areas.</u></p>		



	Name	Provision as notified	Relief sought	Reasons for relief
9.16	Amendments to Policy 52: Minimising adverse effects of hazard mitigation measures – consideration 	When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given to:  (a) <del>the need for structural protection            works or hard engineering            methods;</del> (b) whether non-structural, soft engineering, <i>green infrastructure</i> , <u>room for the river or Mātauranga</u> <u>Māori options provide</u> a more appropriate <u>or suitably innovative</u> <u>solution;</u> (c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, <u>regionally significant</u> <u>infrastructure</u> or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future; (d) <u>the long-term viability of</u> <u>maintaining the structural</u> <u>protection works with particular</u> <u>regard to how climate change may</u> <u>increase the risk over time;</u> (e) <u>adverse effects on Te Mana o te</u> <u>Wai, mahinga kai, Te Rito o te</u> <u>Harakeke, natural processes, or</u> <u>the local indigenous ecosystem</u> <u>and biodiversity;</u> (f) <u>sites of significance to</u>	<b>That the amendments to Policy 52 be            deleted</b>  Delete the FW icon.  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.	Defer to full RPS review in 2024


	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>mana/tangata whenua identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a city, district or regional plan;</u></p> <p>(g) <u>a no more than minor increase in risk to nearby areas as a result of changes to natural processes from the hazard mitigation works;</u></p> <p>(h) <u>the cumulative effects of isolated structural protection works;</u></p> <p>(i) <u>any residual risk remaining after mitigation works are in place,</u> so that they <i>minimise</i> <del>reduce and do not increase</del> the risks <u>from</u> of natural hazards.</p>		
9.17	<p>Amendments to Policy 57: Integrating land use and transportation – consideration</p> 	<p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, <u>require land use and transport planning within the Wellington Region is integrated in a way which:</u></p> <p>(a) <u>supports a safe, reliable, inclusive and efficient transport network;</u></p> <p>(b) <u>supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity;</u></p> <p>(c) <u>minimises private vehicle travel and trip length while supporting mode shift to public transport or active modes and support the</u></p>	<p><b>That the amendments to Policy 56 be amended to the following or similar effect:</b> When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development for land <u>within urban areas or within proposed areas for urban expansion,</u></p> <p>Delete the FW icon</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>This policy should only apply within urban areas or within proposed areas for urban expansion. Land users in remote rural areas with limited options for transportation and movement of people and goods, should not be required to commit to needless costs and delays in assessing alternatives in resource consent applications - for little or no environmental benefit</p>

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>move towards low and zero-carbon modes;</u></p> <p>(d) <u>encourages an increase in the amount of travel made by public transport and active modes;</u></p> <p>(e) <u>provides for well-connected, safe and accessible multi modal transport networks while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical;</u></p> <p>(f) <u>supports and enables the growth corridors in the Wellington Region, including:</u></p> <p>(i) <u>Western Growth Corridor – Tawa to Levin;</u></p> <p>(ii) <u>Eastern Growth Corridor – Hutt to Masterton;</u></p> <p>(iii) <u>Let’s Get Wellington Moving Growth Corridor.</u></p>		
9.18	<p><u>Policy UD.2: Enable Māori cultural and traditional norms – consideration</u></p> 	<p><u>When considering an application for a resource consent, notice of requirement, or a plan change of a district plan for use or development, particular regard shall be given the ability to enable Māori to express their culture and traditions in land use and development, by as a minimum providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</u></p>	<p><b>That Policy UD.2 be deleted.</b></p> <p>Delete the FW icon.</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.</p>	<p>This is a very open-ended provision, including and especially in relation to resource consent applications.</p>


	Name	Provision as notified	Relief sought	Reasons for relief
10	<b>Proposed amendments to Chapter 4.4: Non-regulatory policies</b>			
10.1	<u>Whole chapter</u>	<u>All amendments</u>	<b>Delete all amendments</b>	Defer to full review of the RPS in 2024
10.2	<u>Policy CC.15: Improve rural resilience to climate change – non-regulatory</u> 	<u>Support rural communities in their climate change adaptation and mitigation efforts, including by:</u> (a) <u>providing practical and easily accessible information on climate change projections at a local level,</u> (b) <u>promoting and supporting land management practices and/or land uses that improve resilience to climate change, including nature-based solutions,</u> (c) <u>promoting and supporting land management practices and/or land uses that will reduce gross greenhouse gas emissions,</u> (d) <u>giving preference to climate change efforts that also deliver benefits for indigenous biodiversity, land, fresh and coastal water.</u>	<b>That Policy CC.15 be deleted</b>  Delete the FW icon  And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns.	Defer to full review of the RPS in 2024  Our proposed over-arching Objective A and Objective B are intended to provide a more concrete pathway towards a similar result.
10.3	<u>Policy CC.16: Climate change adaptation strategies, plans and implementation programmes – non regulatory</u>	<u>Regional, city and district councils should, under the Local Government Act 2002, partner with mana whenua / tangata whenua and engage local communities in a decision-making process to develop and implement strategic climate change adaptation plans that map out management options over short, medium and long term timeframes, using a range of tools and</u>	<b>That the amendments to Policy CC.16 be deleted.</b>	Defer to full review of the RPS in 2024



	Name	Provision as notified	Relief sought	Reasons for relief
		<p>methods including, but not limited to:</p> <p>(a) <u>Te Ao Māori and Mātauranga Māori approaches;</u></p> <p>(b) <u>Dynamic adaptive planning pathways or similar adaptive planning approaches;</u></p> <p>(c) <u>City, district or regional plan objectives, policies and rules that address subdivision, use and development for areas impacted by climate change and sea level rise;</u></p> <p>(d) <u>Options for managed retreat or relocation;</u></p> <p>(e) <u>A consideration of <i>Te Mana o te Wai</i> and <i>Te Rito o te Harakeke</i>;</u></p> <p>(f) <u>Hazard mitigation options including soft engineering, <i>green infrastructure</i> or room for the river, and methods to reduce the risks from natural hazards exacerbated by climate change and sea level rise; and</u></p> <p>(g) <u>Equitable funding options required to implement the programme.</u></p>		
10.4	<p><u>Policy CC.18: Increasing regional forest cover to support climate change mitigation: “right tree-right place” – non-regulatory</u></p> 	<p><u>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 and economic well-being of local communities. Priority</u></p>	<p><b>That Policy CC.18 be deleted</b></p> <p>Delete the freshwater icon.</p>	<p>As set out for climate change objectives</p>



	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>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.</u></p>	<p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	
10.5	<p><u>Policy FW.7 Water attenuation and retention – non-regulatory</u></p> 	<p><u>Promote and support water attenuation and retention including:</u></p> <p>(a) <u>nature based solutions including slowing water down in the landscape and increasing groundwater recharge (riparian management, wetland enhancement/restoration, flood management); and</u></p> <p>(b) <u>built solutions including storage at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds).</u></p>	<p><b>That the intent of Policy FW.7 be retained and expressed as an objective.</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Federated Farmers support the intent which is consistent with Ruamahanga WIP recommendations, the Wairarapa Water Resilience Strategy and the recent MPI report “Water Availability and Security”.</p> <p>We suggest that a non-regulatory method expressed only in very general terms and with no commitment to action or timelines is a limp response to the pressing importance of water availability and reliability across all environmental and human domains.</p> <p>Our proposed over-arching Objective B is intended to recognise the importance of this matter, and to provide a concrete pathway towards achieving it.</p>
10.6	<p><u>Policy FW.8: Land use adaptation – non-regulatory</u></p> 	<p><u>Promote and support water resilience and climate change adaptation in land use practices and land use change including:</u></p> <p>(a) <u>Preparing and disseminating information about climate resilient practices</u></p> <p>(b) <u>promoting water resilience in Farm Plans; and</u></p> <p>(c) <u>supporting primary sector groups and landowners in researching and promoting climate resilient land uses and</u></p>	<p><b>That Policy FW.8 be deleted.</b></p> <p>Delete the freshwater icon.</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Federated Farmers support the intent which is consistent with Ruamahanga WIP recommendations, the Wairarapa Water Resilience Strategy and the recent MPI report “Water Availability and Security”.</p> <p>Our proposed over-arching Objectives A and B are intended to provide a concrete pathway towards a similar result.</p> <p>The FW icon should be deleted: accepting it references water, the broader intent and application is as an integrative provision.</p>

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>pathways to move to new land uses.</u></p>		
10.7	<p><u>Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health – non regulatory</u></p> 	<p><u>To maintain, enhance and restore the ecosystem health, ecological integrity and ecological connectivity of the region's indigenous ecosystems, and the ecological processes that support them, giving effect to Te Rito o te Harakeke, the Regional Policy Statement shall, as soon as practicable:</u></p> <p>(a) <u>identify the characteristics required for the region's indigenous ecosystems to be in a healthy functioning state, including the processes that enable them to persist over the long-term, and</u></p> <p>(b) <u>identify strategic targets and priorities to ensure that management and restoration of indigenous ecosystems and habitats (including pest management) are directed at areas where the greatest gains can be made for indigenous biodiversity. Where possible, priorities should also deliver benefits for climate change mitigation and/or adaptation, and freshwater; and</u></p> <p>(c) <u>focus restoration efforts on achieving the strategic targets and priorities identified in (b).</u></p>	<p><b>That Policy IE.3 be deleted.</b></p> <p>Delete the freshwater icon.</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Defer to the 2024 RPS review.</p> <p>We suggest clause a) would more efficiently be progressed at the national level.</p> <p>We generally support the intent of clause b) and c) but note that RPS Change One is not a pre-condition to action.</p> <p>In respect of clause c) – which we broadly support - we question the extent to which proposals for imposing limitations to offsets is necessary and useful.</p>





	Name	Provision as notified	Relief sought	Reasons for relief
10.8	<p>Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity – non- regulatory</p> 	<p>Recognise and provide for the values of landowners and communities as stewards of the indigenous biodiversity of the Wellington Region, by:</p> <p>(a) <u>involving communities in the identification of targets and priorities for <i>protecting, enhancing and restoring</i> indigenous biodiversity; and</u></p> <p>(b) <u>supporting landowner and community <i>restoration of indigenous ecosystems.</i></u></p>	<p><b>That Policy IE be deleted.</b></p> <p>Delete the freshwater icon.</p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>We support the intent; and our proposed over-arching Objective A is intended to recognise the importance of this matter, and to provide a concrete pathway towards achieving it.</p>


	Name	Provision as notified	Relief sought	Reasons for relief
11	<b>Proposed amendments to Chapter 4.5: Methods to implement policies</b>			
11.1	Whole chapter	<u>All amendments</u>	<b>That all amendments to Chapter 4.5 be deleted</b>	<p>Defer to the 2024 RPS review, including in the context that RPS Change One is not an impediment to action on most or all of these methods.</p> <p>Federated Farmers generally support the intent of methods which provide for Council partnering with the community.</p> <p>To that end, we specifically support the wording of Method CC.4 which provides inclusively for “using a partnership approach” and suggest that wording could be used more widely.</p> <p>Our proposed over-arching Objectives A and B are intended to recognise the importance of this approach, and to provide a concrete pathway towards achieving it.</p>
11.2	Method 4 Consideration – resource consents 	<u>Policies 35 to 60, IM.1, IM.2, CC.9, CC.10, CC.11, CC.12, CC.13, CC.14, FW.5, IE.2, UD.2 and UD.3</u> will be implemented, where relevant, when considering a resource consent, notice of requirement, or when changing, varying or reviewing a district or regional plan.	<b>That the amendments to Method 4 be deleted.</b>  Delete the FW icon.	Defer to the 2024 RPS review.
11.3	Method FW.1 Freshwater Action Plans 	<u>Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua, as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP, for each whaitua no later than December 2026. The freshwater action plans will outline non-</u>	<b>That Method FW.1 be deleted</b>	<p>Defer to the upcoming NRP changes in 2023 whaitua) and 2024 (rural whaitua).</p> <p>In respect of “partnerships”, we commend the words in Method CC.4, ie, “using a partnership approach”.</p>


	Name	Provision as notified	Relief sought	Reasons for relief
		<u>regulatory measures, which, along with limits and other rules, will achieve target attribute states. Where an action plan is required by the NPS-FM it shall contain both regulatory and non-regulatory actions.</u>		
11.4	Method CC.2 Develop carbon emissions offsetting guidance	<u>Develop offset guidelines to assist with achieving the regional target for greenhouse emissions where reduction cannot be achieved at the source.</u>	<b>That Method CC.2 be deleted</b>	Defer to the 2024 RPS review.  We anticipate that national guidance will be developed in this area.
11.5	Method IE.1 Partner with mana whenua/tangata whenua to give local effect to te Rito o te Harakeke 	<u>Partner with mana whenua / tangata whenua to identify the local approach to give effect to Te Rito o te Harakeke and develop guidance on how to implement this</u>	<b>That Method IE.1 be deleted</b>  Delete the FW icon	Defer to the 2024 RPS review  We anticipate that national guidance will be developed in this area.
11.6	Method IM.1 Integrated Management 	<u>To achieve integrated management of natural resources, the Wellington Regional Council, district and city councils shall:</u>  (a) <u>partner with and provide support to mana whenua / tangata whenua to provide for their involvement in resource management and decision making;</u> and  (b) <u>partner with and provide support to mana whenua /</u>	<b>That Method IM.1 be deleted.</b>  Delete the FW icon	Our proposed over-arching Objectives A and B are intended to provide a concrete pathway towards a similar result.

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>tangata whenua to provide for mātauranga Māori in natural resource management and decision making; and</u></p> <p>(c) <u>work together with other agencies to ensure consistent implementation of the objectives, policies and methods of this RPS; and</u></p> <p>(d) <u>enable connected and holistic approach to resource management that looks beyond organisational or administrative boundaries; and</u></p> <p>(e) <u>recognise that the impacts of activities extend beyond immediate and directly adjacent area; and</u></p> <p>(f) <u>require Māori data, including mātauranga Māori, sites of significance, wāhi tapu, wāhi tūpuna are only shared in accordance with agreed tikanga and kawa Māori; and</u></p> <p>(g) <u>share data and information (other than in (f) above)</u></p>		



	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>across all relevant agencies; and</u></p> <p>(h) <u>incentivise opportunities and programmes that achieve multiple objectives and benefits.</u></p>		
11.7	<p>Method 32  <u>Partnering engagement with mana whenua/tangata whenua and engaging with stakeholders, landowners and the community in the identification and protection of significant values</u>  </p>	<p><del>Involve Partner with iwi, hapū, marae and/or whānau, and engage with stakeholders, landowners and the community in the to:</del></p> <p>(a) <del>identification and protection of</del> significant places, sites and areas <u>with significant cultural heritage values</u> and significant historic heritage values;</p> <p>(b) <del>identification and protection of</del> outstanding natural features and landscapes, and manage the values of special amenity landscapes, <u>including those with significant cultural values;</u></p> <p>(c) <del>identification and protection of</del> indigenous ecosystems and habitats with significant biodiversity values, <u>including those of significance to mana whenua / tangata whenua;</u></p>	<p><b>That the amendments to Method 32 be deleted.</b></p> <p>Delete the FW icon</p>	<p>Defer to the 2024 RPS review</p>


	Name	Provision as notified	Relief sought	Reasons for relief
		<p>(ca) <u>develop and implement a regional biodiversity strategy described in Method IE.3; and</u></p> <p>D) <u>protection of the values, including mana whenua / tangata whenua values, associated with the rivers and lakes identified in Appendix 1.; and</u></p> <p>E) <u>identify nature-based solutions to climate change as described in Method CC.6.</u></p>		
11.8	<p>Method 34 Prepare a regional water <u>supply strategy</u></p> 	<p><del>With interested parties p</del> Prepare a regional water supply strategy, <u>in partnership with mana whenua / tangata whenua</u>, to guide local authorities on <u>how to:</u></p> <p>(a) <u>improve and maximise efficient allocation of water including economic, technical and dynamic efficiency; sustainable water use</u></p> <p>(b) reduce leakage and wastage from reticulation systems;</p> <p>(c) encourage efficient use of water including through onsite storage;</p> <p>(d) <u>secure sustainable water supplies for communities</u></p>	<p><b>That the amendments to Method 32 be deleted.</b></p>	<p>Defer to the 2024 RPS review</p> <p>We note that the Three Waters Review may alter the landscape on this matter.</p> <p>We question why the method is restricted to urban supplies, in particular clause d.</p> <p>Our proposed over-arching Objective B is intended to provide a concrete pathway towards a similar result.</p>


	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>across the region, preparing for climate change;</u></p> <p>(e) <u>plan additional sources of water, including through storage (including raintanks), treatment, and distribution systems;</u></p> <p>(f) <u>demand management and water conservation programmes and security of supply; and</u></p> <p>(g) <u>developing methods to protect future and existing sources, rural and urban water quality</u></p>		
11.9	<p>Method CC.4 Prepare a regional forest spatial plan</p> 	<p><u>Using a partnership approach, identify where to promote and support planting and natural regeneration of forest, including how to address water quality targets for sediment, to inform the requirements of Policy CC.6.</u></p>	<p><b>That Method CC.4 be deleted.</b></p> <p>Delete the FW icon</p>	<p>Federated Farmers support the intent.</p> <p>Our proposed over-arching Objective A and B are intended to provide a concrete pathway towards a similar result.</p>
11.10	<p>Method CC.5 Review regional response to reducing agricultural greenhouse gas emissions</p>	<p>Monitor changes in agricultural land use and land management practices and review the regional policy approach by 31 December 2024, responding to any predicted changes in greenhouse gas <i>emissions</i> from the agricultural section in the Wellington Region and any new national policy direction</p>	<p><b>That Method CC.4 be deleted.</b></p>	<p>Defer to the 2024 RPS review</p> <p>Federated Farmers note that this method is restricted to just one sector – not all sectors.</p>

	Name	Provision as notified	Relief sought	Reasons for relief
11.11	<p>Method CC.6  <u>Identifying nature based solutions for climate change</u>  </p>	<p><u>By 30 June 2024, the Wellington Regional Council will, in partnership with mana whenua / tangata whenua, identify ecosystems in the Wellington Region that should be prioritised for protection, enhancement, and restoration for their contribution as a nature-based solution to climate change, including those that:</u></p> <p>(a) <u>sequester and/or store carbon (e.g., forest, peatland),</u></p> <p>(b) <u>provide resilience to people and the built environment from the impacts of climate change (e.g., coastal dunelands, street trees, and wetlands),</u></p> <p>(c) <u>provide resilience for indigenous biodiversity from the impacts of climate change, enabling ecosystems and species to persist or adapt (e.g., improving the health of a forest to allow it to better tolerate climate extremes).</u></p>	<p><b>That Method CC.4 be deleted.</b></p> <p>Delete FW icon</p>	<p>Federated Farmers support the intent.</p> <p>We 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.</p> <p>Our proposed over-arching Objective A and B are intended to provide a concrete pathway towards a similar result.</p>






	Name	Provision as notified	Relief sought	Reasons for relief
11.11 a	Method CC.7 <u>Advocating for the use of transport pricing tools</u>	<u>Actively advocate to the Government to introduce new regulatory functions or tools for councils to manage congestion and greenhouse gas emissions within major urban areas through use of pricing tools and/or taxes.</u>	<b>That Method CC.7 be deleted.</b>	Defer to the 2024 RPS review  We make the point that transport taxes should not be imposed on sectors which do not have realistic alternatives, eg, heavy transport, rural areas.  We further note that Council have already been advocating to the Government to this effect, ie, Method CC.7 is not a pre-condition for Council action.
11.12	Method IE.2 <u>Inventory of biodiversity offsetting and compensation opportunities</u> 	<u>Partner with mana whenua / tangata whenua, and engage with interested parties to develop a regional inventory of opportunities for offsetting or compensating for any residual adverse effects on ecosystems and habitats with significant indigenous biodiversity values.</u>	<b>That Method IE.2 be deleted.</b>  Delete the FW icon	Federated Farmers support the intent. We note this can be progressed outside the RPS framework, ie, Method IE.2 is not a pre-condition for action.
11.13	Method IE.3 <u>Regional biodiversity strategy</u> 	<u>Develop and implement, in partnership with mana whenua / tangata whenua and in collaboration with territorial authorities, communities and other key stakeholders, a regional biodiversity strategy to maintain and restore indigenous biodiversity at a landscape scale, incorporating both Mātauranga Māori and systematic conservation planning</u>	<b>That Method IE.3 be deleted.</b>  Delete the FW icon	Defer to the 2024 RPS review  We understand a regional biodiversity strategy has been under development for some time, and request that Council provide an update.



	Name	Provision as notified	Relief sought	Reasons for relief
11.14	<p>Method 48 <u>Water allocation policy review</u></p> <p><del>Investigate the use of transferable water permits</del></p> 	<p><u>Review water allocation policy in the regional plan so that:</u></p> <p><u>(a) Freshwater is allocated and used efficiently;</u></p> <p><u>(b) All existing over-allocation is phased out and future over-allocation is avoided;</u></p> <p><u>(c) Avoid allocating water beyond a limit;</u></p> <p><u>(d) improve water allocation efficiency- including transferable permits;</u></p> <p><u>(e) provide for iwi and hapū rights and interests;</u></p> <p><u>(f) alternatives to first in first served are considered;</u></p> <p><u>(g) provide for equitable allocation;</u></p> <p><u>(h) adapt to climate change;</u></p> <p><u>(i) land use change to more climate resilient uses is promoted;</u></p> <p><u>(j) government direction on water allocation is considered; and</u></p> <p><u>(k) all matters regarding giving effect to the NPS-FM are considered</u></p> <p><del>Investigate whether allowing water permits to be transferred will provide a more equitable use of allocated water.</del></p>	<p><b>That the amendments to Method 48 be deleted.</b></p> <p>And make any consequential amendments needed to give effect to the above relief or to otherwise satisfy our concerns</p>	<p>Defer to the 2024 RPS review.</p> <p>We note this method references iwi and hapu, as distinct from tangata whenua/mana whenua and request clarification.</p> <p>We suggest the key issue this method is attempting to address is the supply/demand issue we discussed in relation to the over-arching issues set out in Chapter 3; and that the more appropriate remedy is our proposed over-arching Objective B.</p> <p>We also suggest the key issue constraining access to water – including for maori land – is not allocation per se, instead it is more about minimum flows.</p> <p>This region is blessed with bountiful water for much of the year: the key issue for all of us – including the river itself – is that we all need water at the time there is the least available.</p> <p>Most of the matters addressed in this method are already well in hand, eg, clauses a to d) - the key issue appears to be in respect of:</p> <ul style="list-style-type: none"> <li>• clause e), ie, providing for iwi or hapu to access water for the development of their land</li> <li>• alongside clause f), ie, can we take it off existing users.</li> </ul> <p>Federated Farmers acknowledge the importance of water for bringing maori land into production (and not just maori land – many landowners do not currently have access to the reliable water needed to sustain or diversify their farms). We suggest an early step may be mapping the location of larger or smaller geographic blocks of land which are currently water-constrained.</p>


	Name	Provision as notified	Relief sought	Reasons for relief
				<p>Federated Farmers equally acknowledge the importance of the investments existing water users have made, often over multi-generations of a farming family, to access and utilise water, and to progressively improve their efficiency of use. A small example: to achieve improved efficiency of water use, many irrigators have made major capital investments in pivot systems. A key consideration must be the efficiency of use of existing investments against the risk of “stranded assets”.</p> <p>Accepting the importance of this matter for both existing and (making room for) new water users, a review of this nature must be informed by excellent information on the resource, on actual current takes, and on the supply-demand gap.</p> <p>We know in advance the gap is likely to be sizeable; and we know already that we will need concerted action to deploy a portfolio of nature-based and built solutions to address it. Our proposed over-arching Objective B is intended to map a pathway.</p>
11.15	<p>Method CC.8  <u>Programme to support low-emissions and climate resilient agriculture</u>  </p>	<p><u>By June 2024, develop a targeted climate change extension programme to actively promote and support changes to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change, including by:</u></p> <p>(a) <u>providing practical and easily accessible information on projected climate change impacts at a</u></p>	<p><b>That Method CC.8 be deleted.</b></p> <p>Delete the FW icon</p>	<p>Defer to the full review of the RPS in 2024.</p> <p>We generally support the intent but we suggest proposing an RPS Change One method is not a pre-condition for getting the job done.</p>

	Name	Provision as notified	Relief sought	Reasons for relief
		<p>(b) <u>local level,</u> <u>providing</u> <u>base data</u> <u>held by the</u> <u>regional</u> <u>council to</u> <u>support the</u> <u>developme</u> <u>nt of farm</u> <u>greenhouse</u> <u>gas</u> <u>emission</u> <u>profiles,</u></p> <p>(c) <u>promoting and</u> <u>supporting actions to</u> <u>reduce agricultural gross</u> <u>greenhouse gas emissions</u> <u>and/or increase climate</u> <u>resilience,</u></p> <p>(d) <u>identifying</u> <u>appropriate areas</u> <u>and species for tree</u> <u>planting/natural</u> <u>regeneration in farm</u> <u>plans as part of</u> <u>implementing the</u> <u>regional spatial forest</u> <u>plan (see Method</u> <u>CC.4),</u></p> <p>(e) <u>identifying other on-</u> <u>farm nature-based</u> <u>solutions that will</u> <u>increase the</u> <u>resilience of a farm</u> <u>system and/or</u> <u>catchment to the</u> <u>effects of climate</u> <u>change,</u></p>		

	Name	Provision as notified	Relief sought	Reasons for relief
		(f) supporting central government and industry climate change programmes/initiatives		
11.16	Method CC.9 <u>Support and funding for protecting, enhancing and restoring indigenous ecosystems</u> 	<u>Provide support, and seek new sources of funding, for programmes that protect, enhance or restore the priority ecosystems identified by Methods IE.2 and CC.7 for their biodiversity values and/or their contribution as nature-based solutions to climate change.</u>	<b>That Method CC.8 be deleted.</b>  Delete the FW icon	Defer to the full review of the RPS in 2024.  We generally support the intent but we suggest proposing an RPS Change One method is not a pre-condition for getting the job done.
11.16 a	Method 53 <u>Provide practical support for mana whenua / tangata whenua and community restoration initiatives for the coastal environment, rivers, lakes and wetlands indigenous ecosystems, with a focus on achieving the targets and priorities identified by Methods IE.2, CC.4 and CC.7.</u> 	<u>Provide practical support for mana whenua / tangata whenua and community restoration initiatives for the coastal environment, rivers, lakes and wetlands indigenous ecosystems, with a focus on achieving the targets and priorities identified by Methods IE.2, CC.4 and CC.7.</u>	<b>That the amendments to Method 53 be deleted</b>  Delete the FW icon	Defer to the full review of the RPS in 2024.  We generally support the intent but we suggest proposing an RPS Change One method is not a pre-condition for getting the job done.
11.17	Method 54 Assist landowners to maintain, enhance and restore indigenous ecosystems 	Assist landowners to <i>maintain, enhance and/or restore</i> indigenous ecosystems <u>identified by Methods IE.2 and CC.7</u> , including by, but not limited to:  (a) assisting with the costs of legally protecting indigenous ecosystems by way of open space	<b>That Method CC.8 be deleted.</b>  Delete the FW icon	Defer to the full review of the RPS in 2024.  We generally support the intent - including clause b in respect of rates rebates (currently an anomaly in the Council rating system) - but we suggest proposing an RPS Change One method is not a pre-condition for getting the job done.



	Name	Provision as notified	Relief sought	Reasons for relief
		<p>covenants with Queen Elizabeth the Second National Trust (QEII);</p> <p>(b) <u>considering opportunities for rates rebates;</u></p> <p>(c) assisting with the costs of controlling pest plants and animals; and</p> <p>(d) supporting landowners to restore significant indigenous ecosystems by fencing and planting.</p>		


	Name	Provision as notified	Relief sought	Reasons for relief
12	<b>Proposed amendments to Appendix 3: Definitions</b>			
12.1	Whole chapter	<u>All amendments</u>	<b>That all amendments to Appendix 3 be deleted</b>	Defer to the 2024 RPS review
12.2	Highly erodible land 	<u>Means land at risk of severe erosion (landslide, earthflow, and gully) if it does not have a protective cover of deep-rooted woody vegetation. Land classified as very high (red) according to the erosion susceptibility classification in the National Environmental Standards for Plantation Forestry 2017.</u>	<b>Delete the new definition</b>  Delete the freshwater icon	Defer to the 2024 RPS review  Further reasons set out in relation to Policy CC.6
12.3	<u>Maintain/maintained/maintenance</u> 	At least no reduction in the following: (a) <u>the size of populations of indigenous species</u> (b) <u>indigenous species occupancy across their natural range</u> (c) <u>the properties and function of ecosystems and habitats</u> (d) <u>the full range and extent of ecosystems and habitats</u> (e) <u>connectivity between and buffering around, ecosystems</u> (f) <u>the resilience and adaptability of ecosystems.</u>  <u>The maintenance of indigenous biodiversity may also require the restoration or enhancement of ecosystems and habitats.</u>	<b>Delete the new definition</b>  Delete the freshwater icon	Defer to the 2024 RPS review  Federated Farmers do not agree that “maintain’ means ‘restore” or “enhance”.

	Name	Provision as notified	Relief sought	Reasons for relief
12.4	Nature-based solutions 	<p><u>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.</u></p> <p><u>Examples include:</u>  <u>Reducing greenhouse gas emissions (climate change mitigation):</u></p> <ul style="list-style-type: none"> <li>• <u>planting forests to sequester carbon</u></li> <li>• <u>protecting peatland to retain carbon stores</u></li> </ul> <p><u>Increasing resilience (climate change adaptation):</u></p> <p><u>(a) providing resilience for people</u></p> <ul style="list-style-type: none"> <li>• <u>planting street trees to provide relief from high temperatures</u></li> <li>• <u>restoring coastal dunelands to provide increased resilience to the damaging effects of storms linked to sea level</u></li> </ul>	<p><b>Delete the new definition.</b></p> <p>Delete the freshwater icon</p>	<p>Defer to the 2024 RPS review</p> <p>We note a more succinct definition is available: NZs First Emissions Reduction Plan references the NZ Biodiversity Strategy 2020 which includes this definition: “solutions that are inspired and supported by nature, cost-effective and simultaneously provide environmental, social and economic benefits and help build resilience.”<sup>82</sup></p>


<sup>82</sup> <https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf>



	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>rise leaving space for rivers to undertake their natural movement and accommodate increased floodwaters,</u></p> <ul style="list-style-type: none"> <li>• <u>the use of water sensitive urban design, such as rain gardens to reduce stormwater runoff in urban areas</u></li> </ul> <p><i>(b) providing resilience for ecosystems and species</i></p> <ul style="list-style-type: none"> <li>• <u>restoring indigenous forest to a healthy state to increase its resilience to increased climate extremes</u></li> </ul> <p><u>leaving space for estuarine ecosystems, such as salt marshes, to retreat inland in response to sea level rise</u></p>		
12.5	Permanent forest 	<u>For the purpose of the RPS permanent forest is a forest established for long term forest cover and is not intended to be harvested.</u>	<b>Delete the new definition</b>  Delete the freshwater icon	Defer to the 2024 RPS review  Further reasons set out in our relief on Objective CC.5 and Policy CC.6
12.6	<u>Plantation forestry</u> 	<u>A forest deliberately established for commercial harvest purposes</u>	<b>Delete the new definition</b>  Delete the freshwater icon	Defer to the 2024 RPS review  Further reasons set out in our relief on Objective CC.5 and Policy CC.6

	Name	Provision as notified	Relief sought	Reasons for relief
12.7	Protect 	<u>Looking after biodiversity and the ecosystem processes that create and maintain it in the long term. This involves managing all threats to secure species from extinction and ensuring that their populations are buffered from the impacts of the loss of genetic diversity and longer-term environmental events such as climate change. This includes, but is not restricted to, legal protection.</u>	<b>Delete the new definition</b>  Delete the freshwater icon	Defer to the 2024 RPS review
12.8	Regionally significant infrastructure	Regionally significant infrastructure includes: <ul style="list-style-type: none"> <li>• <u>pipelines for the distribution or transmission of natural or manufactured gas or petroleum, including any associated fittings, appurtenances, fixtures or equipment</u></li> <li>• <u>a network operated for the purposes of telecommunications, as defined in section 5 of the Telecommunications Act 2001</u></li> <li>• <u>a network operated for the purpose of radiocommunications, as defined in section 2(1) of the Radio Communications Act 1989</u></li> <li>• <u>the <i>National grid</i></u></li> <li>• <u>facilities for the generation and/or transmission of electricity where it is supplied to the <i>National grid</i> and/or the local distribution network</u></li> </ul>	<b>Delete the amendments to the definition</b>	Defer to the 2024 RPS review  Further reasons set out in our relief on Chapter 3.3  We note the definition does not provide for the expanded range of water storage infrastructure – municipal, community and rural – which will be critical across all sectors in the future.

	Name	Provision as notified	Relief sought	Reasons for relief
		<ul style="list-style-type: none"> <li>● <u>facilities for the electricity distribution network, where it is 11kV and above. This excludes private connections to the local distribution network</u></li> <li>● <u>the local authority water supply network (including intake structures) and water treatments plants</u></li> <li>● <u>the local authority wastewater and stormwater networks and systems, including treatment plants and storage and discharge facilities</u></li> <li>● <u>the Strategic Transport Network (including ancillary structures required to operate, maintain, upgrade and develop that network)</u></li> <li>● <u>the following local arterial routes: Masterton-Castlepoint Road, Blairlogie- Langdale/Homewood/Riversdale Road and Cape Palliser Road in Wairarapa, Tītahi Bay Road and Grays Road in Porirua, and Kāpiti Road, Marine Parade, Mazengarb Road, Te Moana Road, Akatārawa Road, Matatua Road, Rimu Road, Epiha Street, Paekakariki Hill Road, The Parade [Paekakariki] and The Esplanade [Raumati South] in Kāpiti</u></li> <li>● <u>Wellington City bus terminal and Wellington Railway Station terminus</u></li> <li>● <u>Wellington International Airport</u></li> <li>● <u>Masterton Hood Aerodrome</u></li> <li>● <u>Kapiti Coast Airport</u></li> <li>● <u>Commercial Port Areas and infrastructure associated with Port</u></li> </ul>		

	Name	Provision as notified	Relief sought	Reasons for relief
		<p><u>related activities in the Lambton Harbour Area within Wellington Harbour (Port Nicholson) and adjacent land used in association with the movement of cargo and passengers and including bulk fuel supply infrastructure, and storage tanks for bulk liquids, and associated wharflines</u></p> <ul style="list-style-type: none"> <li>• <u>Silverstream, Spicer and Southern landfills</u></li> </ul>		
12.9	<p>Te Rito o te Harakeke</p> 	<p><u>Te Rito o te Harakeke is a concept that refers to the need to maintain the integrity of indigenous biodiversity. It recognises the intrinsic value and mauri of indigenous biodiversity as well as people's connections and relationships with it.</u></p> <p><u>It recognises that our health and wellbeing are dependent on the health and wellbeing of indigenous biodiversity and that in return we have a responsibility to care for it. It acknowledges the web of interconnectedness between indigenous species, ecosystems, the wider environment, and the community.</u></p> <p><u>Te Rito o te Harakeke comprises six essential elements to guide tangata whenua and local authorities in managing indigenous biodiversity and developing objectives, policies, and methods for giving effect to Te Rito o te Harakeke:</u></p>	<p><b>Delete the new definition</b></p> <p>Delete the FW icon</p>	<p>Defer to the 2024 RPS review</p>

	Name	Provision as notified	Relief sought	Reasons for relief
		<p>(a) <u>the intrinsic value and mauri of indigenous biodiversity:</u></p> <p>(b) <u>the bond between people and indigenous biodiversity through whakapapa (familial) relationships and mutual interdependence:</u></p> <p>(c) <u>the responsibility of care that tangata whenua have as kaitiaki, and that other New Zealanders have as stewards, of indigenous biodiversity:</u></p> <p>(d) <u>the connectivity between indigenous biodiversity and the wider environment:</u></p> <p>(e) <u>the incorporation of te ao Māori and mātauranga Māori:</u>  <u>the requirement to partner with tangata whenua.</u></p>		

