

14 October 2022

Wellington Regional Council  
PO Box 11646  
Manners Street  
Wellington 6142  
[regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

Jo Miller  
Chief Executive  
Hutt City Council  
[district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)

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

1. This is the submission of Hutt City Council on Proposed Change 1 to the Regional Policy Statement for the Wellington Region (operative 2013).
2. Our address for service is [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz).
3. We could not gain an advantage in trade competition through this submission.
4. We wish to be heard in support of this submission at a hearing and will consider making a joint case with others.

### Introduction

5. Hutt City Council (“HCC” or “the Council”) welcomes the opportunity to make a submission on the proposed change (“PC1” or “the proposal”) to the Regional Policy Statement for the Wellington Region (“RPS”).
6. Thank you for the opportunity for officers to provide input on the earlier draft of PC1 and we note that several changes have been made to the proposal that address some of those concerns.
7. This submission reflects the views of the elected Council as well as technical matters identified by officers.
8. We support this proposal in taking stronger action on addressing climate change, freshwater, indigenous biodiversity protection, natural hazards, and the direction for quality urban intensification. We note with approval that stronger action on climate change reflects our recognition of a Climate Change Emergency.
9. Accordingly, we are in support of most of the aims of the proposal, whether they are delivered through the RPS or otherwise.
10. However, we provide feedback about a number of the proposed changes including:
  - a. the scope and timing of some of the changes,
  - b. the nature of some of the changes in relation to the role of the RPS within the hierarchy of planning documents, and the scope and purpose of the resource management system,

- c. the structure of the RPS relative to the changes proposed, and
  - d. the workability and implementation of the proposed changes.
11. As PC1 is a significant change to the RPS, we don't seek one overall decision on the proposed change as our requests vary by provision. In several parts we support the change, generally with amendments. In other parts, we oppose the provisions. Where not specifically mentioned, we are neutral on the proposal.
  12. Our submission has been developed after collaboration with other territorial authorities in the region, and with Wellington Water which is part-owned by Hutt City Council. As those authorities are making their own independent submissions, there will be some alignment in requests with those parties, but the respective submissions are not necessarily reflective of each other's views.

## **Discussion**

13. We support the intent of PC1 and the desire to take an integrated management approach to the key resource management issues that are addressed in the proposal. We also appreciate that GWRC must meet its statutory requirements in giving effect to both the National Policy Statements on Freshwater Management and Urban Development.

### **Climate Change**

14. We support the intent of the amendments relating to climate change and support the RPS including specific objectives and policies to address this issue. We support stronger objectives supporting emissions reductions. However, the policies and methods need to better integrate with, and not duplicate, non-RMA tools.
15. Many of the proposed provisions are also outside the scope of an RPS or are likely to be difficult to implement through the resource management system in practice.

### **Fresh Water**

16. The regional council is obliged to make changes to Chapter 3.8 Fresh Water, in accordance to the National Policy Statement for Freshwater Management. As with other areas of the RPS our submission highlights that there are some limits on what we think is appropriate to include in an RPS.

### **Indigenous Biodiversity**

17. We are concerned that the PC1 pre-empts forthcoming national direction on indigenous biodiversity and goes further than what has been signalled in recent consultation on that national direction. The forthcoming National Policy Statement on Indigenous Biodiversity ("NPS-IB") is expected to be gazetted by the end of 2022 and PC1 is inconsistent with the direction that has been signalled in the recent exposure draft.
18. This is particularly the case with regard to the timeframes for incorporating 'significant natural areas' into district plans, and the range of matters that will need to be considered in doing so. This creates a risk of duplicated or redundant assessment and adds complexity and consultation fatigue for a community that has already been dealing with this issue for some time.

19. We request that the parts of the proposed change that relate to indigenous biodiversity should be deleted, and if further regional direction is required once the NPS-IB is gazetted, pursue a variation or standalone RPS change.
20. If that option is not taken up, then the proposed deadline should be reconsidered. Given the changed criteria this council will need to completely reassess indigenous biodiversity in the district, and restart consultation with affected landowners. This is not compatible with a deadline of June 2025, which is possibly before the RPS change will be operative. The deadline should be set at a minimum of 5 years from when the RPS change becomes operative.

### **Natural Hazards**

21. We support the proposed direction on natural hazards. This is consistent with the risk-based approach proposed in our recent Plan Change 56: Enabling Intensification in Residential and Commercial Areas and that we have been preparing as part of our full District Plan review. As with other areas of the RPS change our submission highlights that there are some limits on what we think is appropriate to include in an RPS.

### **Regional form**

22. The regional council is obliged to implement clause 3.8(3) of the National Policy Statement on Urban Development, and we generally support the proposed approach in PC1 but with some amendments to improve its application.
23. The National Policy Statement on Urban Development (“NPS-UD”) already provides most necessary direction, and in many cases the proposal simply restates that national direction. We recommend the RPS does not duplicate the national direction.

### **Scope of the regional policy statement**

24. Some of the proposed changes fall outside what can be achieved through the resource management system, or through a Regional Policy Statement. In some cases, the roles of regional and city/district councils appear to have been confused. In other cases, the RPS purports to direct city and district councils in the exercise of non-RMA functions, or to direct bodies with no statutory responsibility to give effect to the RPS.
25. We consider that a Regional Policy Statement should bridge national direction with the detailed implementation in regional and district plans, and provide context specific to this region. However, many parts of the proposal either duplicate higher order documents or attempt to replace the role of district plan objectives and policies.
26. In some cases, new national direction has been provided since 2013 and therefore the regional direction is no longer required. However, this proposal does not take the opportunity to remove now-redundant direction.
27. The changes to the Regional Policy Statement provides significant direction for assessing individual resource consents, which we consider to be an issue. While there are situations in which resource consent decision-makers may need to refer back to higher order documents or even Part 2 of the RMA, we would generally expect regional plans and district plans to be complete and clear enough to provide adequate policy guidance without needing to refer back to higher order documents in most cases.

28. Contemporary district plans are generally drafted in a manner so that where activities are generally anticipated by the plan (and higher order documents), most resource consent applications can be considered on a non-notified basis and with restricted discretion. Considering a wide range of issues in each consent is not compatible with this approach.
29. In addition, the requirement to consider relatively high level objectives and policies in each resource consent means that each resource consent potentially becomes an opportunity to re-litigate and therefore need to re-assess decisions already made at the plan-making stage.

## Decisions Requested

30. We request the following general decisions:
  - a. Delete all provisions relating to indigenous biodiversity, and prepare a new policy statement change or variation after the upcoming National Policy Statement on Indigenous Biodiversity is gazetted if regional direction is still required.
  - b. Failing that, align the provisions for indigenous biodiversity with the exposure draft of the NPS-IB and amend the deadlines relating to indigenous biodiversity from 30 June 2025 to 5 years after RPS Change 1 becomes operative.
  - c. Delete all non-regulatory policies and methods that apply to city and district councils.
31. We request the following decisions in general for all provisions:
  - a. Make all necessary consequential amendments to introductions, notes, formatting, tables, and indexes.
  - b. Provide all further or other consequential relief as may be necessary to fully give effect to the relief sought.
32. We also request the following decisions on specific provisions. For some provisions our requested relief is described in general terms. Where we propose specific wording changes, these are shown with underline for additions and ~~strike through~~ for deletions, to either the operative or proposed provision as relevant.

### Chapter 3 – Resource management issues (etc.)

Provision	Position	Reasons	Relief sought
Amendment to Chapter 3 Introduction	Oppose	<p>The purpose of including overarching issues is presumably to provide a more integrated approach across the range of regional resource management issues in the RPS and subordinate planning documents. As such, it is important that all relevant issues are visible in this overarching section. As proposed, they are not.</p> <p>In general, the Regional Policy Statement is already lengthy and including both issues and objectives does not add significantly to the plan’s usability. Accordingly, the Council seeks the deletion of overarching issues.</p> <p>These are detailed below.</p>	<p>Omit the issue statements.</p> <p>Alternatively, if the overarching issues are retained, the following amendments are sought:</p> <ul style="list-style-type: none"> <li>• Reframe the issue statements as general environmental issues, rather than as critiques of current practice.</li> <li>• Ensure issues relating to the needs of the urban environment are included (not just the impacts of the urban environment on the natural environment)</li> </ul>
Amendment to Chapter 3 Introduction – new overarching issue 2	Oppose along with other issue statements. If issue statements are included, then support with amendment	We note that GWRC has addressed concerns raised in the draft by adding an additional issue around the urban environment. However, it still considers only the pressures that the urban environment places on the natural environment, rather than the social and economic needs for a well-functioning urban environment.	<p>Delete the issue statement (along with other issues), or if issue statements are retained amend Issue 2 as follows:</p> <p>“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>At the same time, there is a need to increase housing supply across the region and ensure that future communities have good access to key services and employment opportunities.</u> Planning decisions will need to consider a</p>

Provision	Position	Reasons	Relief sought
			<u>range of factors that contribute to a well-functioning urban environment and how the natural and built environment can work together to achieve this.”</u>
New Objective A (within Chapter 3 Introduction)	Support with amendment	To aid in navigating the RPS, the objective should not be located within a chapter introduction, but stand alone.	Relocate proposed Objective A out of the chapter introduction and treat consistently with how other objectives in the RPS are presented.

### Chapter 3.1A – Climate Change

Provision	Position	Reasons	Relief sought
New Chapter 3.1A Introduction	Support with amendment	The wording of the introduction “seven of the past nine years” will soon be out of date.	Amend the start of the introduction:  “ <u>As of 2022</u> , long term weather records...”  Or otherwise reword so that it will continue to make sense when read in future years.
New Objective CC.2	Oppose	While the intent of this objective is supported, there is limited ability to advance this goal through the resource management system. The policies and methods (other than Policy IM.2, which we comment on below) have limited relevance to this objective compared to other proposed objectives on climate change.	Delete the objective.
New Objective CC.3	Support with amendment	The general intent of the objective is supported. However, we question whether the proposed policies and methods (or any possible policies and methods of an RPS) can take primary responsibility for achieving this goal.	Amend Objective CC.3 to clarify the intent of clause (a)(ii) add to the following note:  “ <u>Note: while policies and methods of this RPS contribute to achieving this objective, it</u>

Provision	Position	Reasons	Relief sought
		In addition, clause (a)(ii) refers to a percentage change in mode share. Mode share is already a percentage – the objective should clarify whether this goal is 40 percent of the relevant current mode share figure, or 40 percentage points.	<u>is primarily achieved outside the resource management system, including through the New Zealand Emissions Trading Scheme”</u>
New Objective CC.4	Support	Support as proposed.	Retain Objective CC.4
New Objective CC.5	Support with amendment.	Support intent. This objective can primarily be achieved only through the methods available to the regional council under s30 of the RMA, and through methods outside the resource management system.	Amend Objective CC.5 and associated methods to make clear that they only apply to regional councils. (See also relief sought for Method CC.4).
New Objective CC.6	Support	Support as proposed.	Retain Objective CC.6
New Objective CC.7	Oppose	While the intent of this objective is supported, it can only be achieved through non-RMA methods, and therefore does not belong in the RPS.	Delete Objective CC.7

### Chapter 3.4 – Fresh water

Provision	Position	Reasons	Relief sought
Replacement Objective 12	Support with amendment	We support the objective, but it simply restates the objectives and principles from section 1.3 of the National Policy statement for Freshwater Management 2020 (NPS-FW). We consider that provisions of higher order national direction should not be duplicated in the RPS. Rather, appropriate objectives drafted for the regional context that give effect to national direction.	Amend Objective 12 to give effect to the NPS-FW in the regional context, rather than repeating the higher order direction.

### Chapter 3.6 – Indigenous ecosystems

Provision	Position	Reasons	Relief sought
Chapter 3.6 – General	Oppose all changes	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity (“NPS-IB”). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
Amendment to Chapter 3.6 Introduction	Oppose		
Amendment to Objective 16	Oppose		
New Objective 16A	Oppose		
New Objective 16B	Oppose		
New Objective 16C	Oppose		

### Chapter 3.8 – Natural hazards

Provision	Position	Reasons	Relief sought
Amendment to Chapter 3.8 Introduction	Support	Support as proposed.	Retain proposed amendments to Chapter 3.8 Introduction
Amendment to Objective 19	Support		Retain proposed amendments to Objective 19.
Amendment to Objective 20	Support		Retain proposed amendments to Objective 20.
Amendment to Objective 21	Support		Retain proposed amendments to Objective 21.

### Chapter 3.9 – Regional form, design and function



<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
Amendment to Chapter 3.9 Introduction	Oppose	This introduction is very long and does not add to understanding the objectives and policies relating to regional form, design, and function.	Reduce the length of the introduction and ensure it provides sufficient guidance for RPS users about the objectives and policies relating to regional form, design and function.
Replacement of Objective 22	Support	Support as proposed.	Replace Objective 22 as proposed.
New Objective 22B	Oppose	This objective is unclear, particularly in relation to what it means to be “strategically planned”. As the objective primarily supports non-regulatory methods and consideration policies, the objective seems unnecessary.	Delete new Objective 22B

#### **Chapter 4.1 – Regulatory policies – direction to district and regional plans (etc.)**

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
New Policy CC.1	Support with amendment	<p>District plans have limited ability to regulate how transport infrastructure is operated. District plans regulate land use and cannot generally affect how road and rail infrastructure is allocated between modes or used.</p> <p>In general, the major decisions around how transport infrastructure is designed and constructed to reduce greenhouse gas emissions are locked in when a project’s broad outlines are set, and the choice is made to fund the project. By the time a project is at detailed consenting stage, it is too late to make major changes (such as route or mode). Therefore, we see more of the detailed design choices as being best achieved outside the resource management system, through:</p>	<p>Substitute new Policy CC.1:</p> <p><u>Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure – district and regional plans</u></p> <p>District and regional plans shall include objectives, policies, and methods that only enable new transport infrastructure or significant alterations to transport infrastructure where it:</p> <p>(a) does not provide added transport network capacity for <i>high-carbon passenger transport modes</i>; and</p>

Provision	Position	Reasons	Relief sought
		<ul style="list-style-type: none"> <li>• Decisions on infrastructure investment made in the Regional Land Transport Plan (see amendments proposed to Policy 9 and new Policy EIW.1, and Action 10.1.4 in the Ministry for the Environment’s Emissions Reduction Plan)</li> <li>• Mode choice decisions made by individuals in response to the incentives provided for by the NZ Emissions Trading Scheme, regional council decisions on public transport fares, etc.</li> </ul> <p>This policy retains its importance chiefly through the ability to, and the threat of, inappropriate projects having their consents declined. We therefore suggest amendments to strengthen the policy that it can realistically be used to decline inappropriate projects.</p> <p>That said, we still support the policy’s direction to control the design and construction of transport infrastructure to the extent this is possible at the stage it is controlled by the resource management system.</p>	<p>(b) to the extent possible for a project of its scale, maximises local and regional mode shift from <i>high-carbon passenger transport modes</i> to <i>low and zero-carbon modes</i>; and</p> <p>(c) is designed and constructed to minimise greenhouse gas emissions; and</p> <p>(d) can be and is intended to be operated to minimise greenhouse gas emissions</p>
New Policy CC.2	Oppose, or failing that, amendment	<p>Travel demand management plans are only one tool for achieving travel demand management and driving mode shift. For small developments, developments without parking, or developments in zones already identified as well-located suitable for denser development, they are generally impractical or disproportionately burdensome.</p> <p>We request the policy be deleted, and district plans and resource consent decisions decide what situations</p>	Delete new Policy CC.2.

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
		would require travel demand management plans as well as the threshold of scale to be applied.	
New Policy CC.3	Support with amendment	Support, but a definition for “zero and low-carbon multi-modal transport” needs to be provided.	<ul style="list-style-type: none"> <li>• Retain Policy CC.3</li> <li>• Include a definition for ‘zero and low-carbon multi-modal transport’.</li> </ul>
New Policy CC.4	Oppose.	This policy is not sufficiently clear for policy statement users to understand what is required.	Delete Policy CC.4.
New Policy CC.7	Oppose, to the extent it applies to territorial authorities.	The definition of “nature-based solutions” is not sufficiently clear for policy statement users to understand what is required. It is also unlikely that a district or regional plan would fail to provide for nature-based solutions to be part of development and infrastructure planning and design in the absence of this direction.	Delete Policy CC.7
Amendment to Policy 3	Support	Support as proposed	Amend Policy 3 as proposed
Amendment to Policy 7	Support	Support as proposed	Amend Policy 7 as proposed
Amendment to Policy 9	Support	Support as proposed, note our comments on proposed new Policy CC.1 that the Regional Land Transport Plan is a useful tool to achieve the relevant objectives.	Amend Policy 9 as proposed.
Deletion of Policy 10	Support	Support deletion of this policy.	Delete Policy 10 as proposed.
New Policy EIW.1	Support	Support as proposed, note our comments on proposed new Policy CC.1 that the Regional Land Transport Plan is a useful tool to achieve the relevant objectives.	Retain Policy EIW.1
Amendment to Policy 12	Support with amendment	The policy simply restates the direction of the National Policy Statement for Freshwater. We suggest redrafting the policy to apply it in the regional context.	Redraft Policy to apply higher order direction in the regional context.
Deletion of Policy 13	Support	Support as proposed.	Delete Policy 13 as proposed.

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
Amendment to Policy 14	Support with amendment	This policy duplicates other policies in the RPS. (e.g. Policy 15 (i))	Redraft Policy 14 to remove duplication
Amendment to Policy 15	Support	Support as proposed	Amend Policy 15 as proposed.
Amendment to Policy 17	Support	Support as proposed	Amend Policy 17 as proposed.
Amendment to Policy 18	Support	Support as proposed	Amend Policy 18 as proposed.
New Policy FW.1	Neutral with amendment	Neutral on substance of policy but note an error in Table 4: Policy FW.1 is listed as being implemented by Method 1 which applies to city and district councils, but it should be Method 2. This appears to have been swapped with Policy FW.2.	Amend Table 4 as it relates to Policy FW.1 to be implemented by Method 2.
New Policy FW.2	Oppose, or failing that, amendment	<p>While the intent of the policy is supported, there is no way to implement this policy with provisions in a district plan that can adequately be monitored or enforced. Although this provision does allow for consent conditions on subdivisions, the outcomes will also fall within the provisions of:</p> <ul style="list-style-type: none"> <li>Wellington Water Limited or its successors as a water provider</li> <li>The regional council as a water take and use consenting authority</li> </ul> <p>In addition, if the policy is retained, there is an error in Table 4 (see our comments on Policy FW.1)</p>	<p>Relief sought:</p> <ul style="list-style-type: none"> <li>Delete policy, or</li> <li>Amend as follows:</li> </ul> <p><b>“Policy FW.2: Reducing water demand – district plans</b></p> <p>District plans shall include policies, <del>rules</del> and <del>or</del> methods to reduce demand of water from registered water suppliers and users, including where practicable:</p> <p>(a) provisions improving the efficiency of the end use of water <del>on a per capita basis</del> for new developments; and</p> <p>(b) provisions requiring alternate water supplies for non-potable use in new developments.</p>

Provision	Position	Reasons	Relief sought
			<p>...“</p> <p>And correct Table 4 to refer to Method 1 rather than Method 2.</p>
New Policy FW.3	Support with amendment	This is long, complex and prescriptive. Some of the points relate to requirements already set out in the RMA. Redrafting of this policy is required to make it more succinct.	Retain Policy FW.3, but amend to reduce the length and complexity of the policy by removing clauses that duplicate higher order direction.
New Policy FW.4	Oppose	<p>The question of how to fund stormwater management measures is a solely a decision for territorial authorities and their communities under the Local Government Act. There are a number of different tools territorial authorities can use, one of which is financial contributions. Councils also have other funding options, such as using general revenues, targeted rates, or central government funding assistance. These decisions are best made by territorial authorities based on their local context, rather than being directed through the Regional Policy Statement.</p> <p>There are also a number of issues with this policy as drafted, including the lack of a definition for “fair share”, the application to financial contributions levied for permitted activities, and the inaccurate note.</p>	Delete new Policy FW.4
Amendment to Policy 23	Oppose, or failing that, amendment.	We seek the deletion of all the proposed provisions relating to indigenous biodiversity until the upcoming National Policy Statement on Indigenous Biodiversity is gazetted.	<p>Delete amendments to Policy 23 and retain the Operative RPS Policy 23.</p> <p>Failing that, amend the deadline from 30 June 2025 to 5 years after RPS Change 1 becomes operative.</p>

Provision	Position	Reasons	Relief sought
Amendment to Policy 24	Oppose, or failing that, amendment.	If the provisions are nonetheless added, then HCC seeks an amendment to the deadline date from 30 June 2025 to 5 years from the operative date of the proposed RPS change 1. This is because the deadline does not align with the deadline proposed in the most recent draft of the National Policy Statement on Indigenous Biodiversity (5 years from the commencement date of that NPS).	Delete amendments to Policy 24 and retain the Operative RPS Policy 24.  Failing that, amend the deadline from 30 June 2025 to 5 years after RPS Change 1 becomes operative.
New Policy IE.1	Oppose, or failing that, amendment.		Delete new Policy IE.1.
Amendment to Policy 29	Support with amendment	Support the intent of this policy. As some hazards recur with a frequency of less than 1 in 100 years (such as fault ruptures) it should be clarified that it does not preclude consideration of hazards beyond this time period.	Retain the amendments to Policy 29, but with the following change to clause (b):  “use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over <u>at least</u> a 100 year planning horizon;”
Amendment to Policy 30	Support with amendment	We support removing references that could be construed as references to national planning standards zones. the current policy in the operative RPS also uses terms in a way that are inconsistent with the national planning standards.  However, we do not support the concept of “locally significant centres”. If centres are not of regional significance, then they should not be addressed by the Regional Policy Statement.  The amendments also continue the unnecessary distinction of “sub-regional” and “suburban” centres in the operative RPS. While this distinction is made in the list of centres, the policy direction does not reflect this	Amend Policy 30 as follows:  <b>“Policy 30: Maintaining and enhancing the viability and vibrancy of regionally significant centres – district plans</b>  District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of:  1. The <del>regionally significant central business district</del> <u>main centre of the region, the central business area of Wellington City;</u> 2. Other <i>regionally significant centres</i> :

Provision	Position	Reasons	Relief sought
		<p data-bbox="696 231 1364 295">difference and does not accurately reflect differences in the size, scale, and role of centres.</p> <p data-bbox="696 339 1364 587">We request that all centres other than the Wellington City Centre be listed as “other regionally significant centres”. District plans can then set out the hierarchy and role of centres a district. We support both the Lower Hutt city centre and the Petone commercial area continuing to be identified as having regional significance.</p>	<p data-bbox="1480 231 1888 368">(i) Lower Hutt; (ii) <u>Petone</u>; <i>[(iii) and other centres outside the City of Lower Hutt as appropriate]</i></p> <p data-bbox="1384 413 1798 480"><del>3. the locally significant centres of:</del> <del>{list of centres}</del></p> <p data-bbox="1384 525 1541 552"><b>Explanation</b></p> <p data-bbox="1384 596 1926 1401">Policy 30 identifies the <del>hierarchy of</del> regionally <del>and locally</del> significant centres within the Wellington Region for which district plans must maintain and enhance their vibrancy and vitality. The centres identified are of significance to the region’s form for economic development, transport movement, civic or community investment. Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. It is also important for their prosperity and resilience in the face of social and economic change. The <del>regional-central business district area of Wellington City is the major centre</del> <u>the main centre</u> in the Wellington region; the other key centres also provide significant <del>business, retailing</del> <u>commercial</u> and community services. This policy does not limit territorial authorities from identifying additional centres of local <u>or</u></p>

Provision	Position	Reasons	Relief sought
			<p><u>sub-regional</u> significance within the district plan.”</p> <p>(Our submission is neutral on which centres outside the Hutt City Council area are included, other than the Wellington City centre)</p>
Amendment to Policy 31	Support deleting operative policy. Oppose replacement policy.	The operative policy is redundant, and we support it being removed. However, the replacement policy simply repeats the direction of the National Policy Statement on Urban Development, without providing any additional direction or regional context.	Delete Policy 31 as proposed. Delete proposed replacement Policy 31
Amendment to Policy 32	Support.	Support as proposed.	Retain amended Policy 32.
Amendment to Policy 33	Support	Support as proposed.	Retain amended Policy 33.
New Policy UD.1	Support with amendment	While we support the general intent of this policy it is unclear which situations the policy is intended to apply to. At minimum the policy should set out whether it applies only to Māori freehold land, or whether any general land in Maori ownership is included, and which mana whenua groups should be covered.	Amend Policy UD.1 to clarify which situations the policy applies to.

#### Chapter 4.2 – Regulatory policies – matters to be considered

Provision	Position	Reasons	Relief sought
New Policy IM.1	Support with amendment	While we support the general intent of the policy, these are high level considerations and do not specify the situations where particular action should be taken. This is inevitable given the scale of a Regional Policy	<p>Amend Policy IM.1 as follows:</p> <p><b>“Policy IM.1: Integrated management – ki uta ki tai – consideration</b></p>



Provision	Position	Reasons	Relief sought
		<p>Statement and the wide range of situations it must cover.</p> <p>Other than clause (e), which we comment on below, we support the policy in its application to notices of requirement and district plans. District plans are the appropriate place to set policies and rules that provide thresholds for different matters to be considered in resource consents.</p> <p>In relation to clause (e), which covers Māori data sovereignty, while we appreciate the importance of this issue it was not included in the draft proposal on which officers provided feedback. We are not equipped in the time available to make meaningful input on how policy relating to Māori data could work.</p> <p>Hutt City Council is currently doing internal work on a data ethics policy, but it is too soon to include this in a regulatory method in the RPS. Council seeks further engagement with the regional council, tangata whenua/mana whenua, and the community on this matter.</p> <p>Accordingly we oppose clause (e) and seek its deletion, and this matter be pursued through a separate RPS change at a later date if found necessary after meaningful engagement.</p>	<p>When considering <del>an application for a resource consent</del>, a notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be given to:</p> <p>(a) partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua involvement in resource management and decision making; and  (b) recognising the interconnectedness between air, freshwater, land, coastal marine areas, ecosystems and all living things – ki uta ki tai; and  (c) recognising the interrelationship between natural resources and the built environments; and  (d) making decisions based on the best available information, improvements in technology and science, and mātauranga Māori; and  <del>(e) upholding Māori data sovereignty; and</del>  (f) requiring Māori data and mātauranga Māori to be interpreted within Te Ao Māori; and  (g) recognising that the impacts of activities may extend beyond immediate and directly adjacent area, and beyond organisational or administrative boundaries</p> <p><b>Explanation</b></p>

Provision	Position	Reasons	Relief sought
			<p>This policy requires that a holistic, integrated view is taken when making resource management decisions. It also requires both regional and district councils to provide for mana whenua / tangata whenua are actively involved in resource management and decision making, including the protection of mātauranga Māori and Māori data.”</p>
New Policy IM.2	Oppose, and failing that, amendment	<p>While we appreciate the intent of the policy, the matters it addresses are generally not resource management considerations for city and district councils as they cannot be addressed through controlling land use or subdivision. The policy is also not supported by any higher order document or provision in the RMA.</p> <p>If the policy is included, it is also insufficiently clear for assessing resource consents about what situations it applies to, the threshold of significance, and what matters should be considered.</p>	<ul style="list-style-type: none"> <li>• Delete Policy IM.2, or failing that,</li> <li>• Amend the policy so that it does not apply to resource consents, or failing that,</li> <li>• Amend the policy to set situations and thresholds for which this assessment should apply.</li> </ul>
New Policy CC.9	Support with amendment	While we support the intent of the policy, this assessment is not feasible in relation to individual resource consent applications.	<ul style="list-style-type: none"> <li>• Remove the requirement to undertake this assessment for individual resource consent applications.</li> <li>• Include a definition of ‘optimise’ within RPS Change 1.</li> </ul>
New Policy CC.10	Support with amendment	While we support direction on this issue to inform zoning decisions for the appropriate location for freight distribution facilities and industrial areas, this assessment is not feasible in relation to individual resource consent applications.	Remove the requirement to undertake this assessment for individual resource consent applications.

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
New Policy CC.11	Oppose	This assessment is better conducted as part of funding and design decisions made by transport infrastructure providers. By the time a consent application is made, there is little meaningful action possible to affect whole of life emissions other than to decline a proposal. These assessments should be undertaken in the earlier stages of a proposal, before reaching the RMA stage.	Delete new Policy CC.11
New Policy CC.12	Oppose	The definitions of relevant terms including “nature-based solution”, “climate change adaptation”, and “climate change mitigation” are not clear enough to implement this policy. In addition, it does not adequately set situations or thresholds where this assessment should occur.	Delete new Policy CC.12
New Policy CC.13	Neutral, with amendment	We are neutral towards the overall intent of the policy but request the policy is amended to make clear that it applies to regional consents (which are the only relevant consents to the policy).	Retain Policy CC.13, but amend as follows:  “When considering an application for a <u>regional</u> resource consent, ...”
New Policy CC.14	Oppose	The principles for water sensitive urban design (clause (b)) and rainwater retention (caluse (c)) duplicate the freshwater-specific policies and should be deleted.  The remaining matters cannot be achieved through the regulatory means available to territorial authorities. As such, if this policy is retained, we seek an amendment to clarify that the policy applies to regional plans only.	<ul style="list-style-type: none"> <li>• Delete new Policy CC.14, or</li> <li>• Amend the policy to remove clauses (b) and (c) and clarify that the policy only applies to regional plans.</li> </ul>
Amendment to Policy 39	Support with amendment	Support but note that resource consent decisions have little practical ability to determine whether infrastructure contributes to reducing greenhouse gas emissions, and	Amend Policy 39 to clarify that the policy does not require renewable energy projects and regionally significant infrastructure

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
		the resource management system as a whole is not well suited to influencing decisions about alternative projects. See our comments on Policy CC.11.	projects to conduct a greenhouse gas assessment at resource consent stage, unless the applicant is relying on the beneficial environmental effects of greenhouse gas emissions reductions to justify the project.
Amendment to Policy 40	Neutral with amendment	No position on the substance of this policy but note a mistake in Table 4: the cross-reference to Method 4 (implemented by city and district councils) should be Method 2 (Regional plan implementation).	Amend Table 4: Under Policy 40, remove reference to Method 4 and replace with Method 2.
Amendment to Policy 41	Support	Support as proposed	Retain amended Policy 41.
Amendment to Policy 42	Support	Support as proposed	Retain amended Policy 42.
Amendment to Policy 43	Support	Support the deletion of this policy.	Delete Policy 43 as proposed.
Amendment to Policy 44	Support	Support as proposed	Retain amended Policy 44.
New Policy FW.5	Support	Support as proposed.	Retain new Policy FW.5 as proposed.
Amendment to Policy 47	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity (“NPS-IB”). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.  We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
New Policy IE.2	Oppose		

Provision	Position	Reasons	Relief sought
		should occur through a variation or a separate policy statement change.	
Amendment to Policy 51	Support with amendment	Support the intent of this policy. However, we expect district plans will adequately provide for the situations where natural hazards should be considered and this does not need to be revisited in individual resource consents where the district plan has already assessed the level of risk.	Retain amended Policy 51 but modified so that it does not apply to resource consents once the relevant district or regional plan has given effect to Policy 51.
Amendment to Policy 52	Support with amendment	Support the intent of this policy, but: <ul style="list-style-type: none"> <li>• A suitably specific definition is needed for “room for the river”</li> <li>• The reference to innovation is redundant. Innovation is not a goal in and of itself, and whether a solution is innovative is independent of whether it is effective.</li> </ul>	Retain amended Policy 52 but: <ul style="list-style-type: none"> <li>• provide a definition for “room for the river”, and</li> <li>• amend clause (b) as follows: <p>“(b) whether non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options provide a more appropriate or suitably innovative solution;”</p> </li> </ul>
Amendment to Policy 55	Support with amendment	Support as proposed.	Retain amended Policy 55.
Amendment to Policy 56	Support with amendment	Support in relation to changes, variations, and reviews of district plans. However, for territorial authority land use and subdivision consents, this level of assessment is likely to be redundant given the more detailed objectives, policies, and assessment criteria that would be included in rural zone and subdivision chapters.	Amend Policy 56 insofar as it applies to resource consents, so that it only applies to regional resource consents.
Amendment to Policy 57	Support with amendment.	While we support direction on this issue to inform decisions on district plans, this type of analysis should be complete at plan-making stage and it is redundant and infeasible to reconsider the issue from scratch for each resource consent.	Amend Policy 57 so that it does not apply to resource consents.

Provision	Position	Reasons	Relief sought
Amendment to Policy 58	Support with amendment	<p>While we support direction on this issue to inform decisions on district plans, this type of analysis should be complete at plan-making stage and it is redundant and infeasible to reconsider the issue from scratch for each resource consent.</p> <p>There may be resource consents for developments not anticipated in their zone for which this type of assessment will be relevant. However, district plans that themselves implement this policy will have sufficient direction without needing to go up to the Regional Policy Statement as well.</p>	Amend Policy 58 so that it does not apply to resource consents.
New Policy UD.2	Support with amendment	<p>While we support direction on this issue to inform decisions on district plans, this type of analysis should be complete at plan-making stage and it is redundant and infeasible to reconsider the issue from scratch for each resource consent. District plans that implement this policy will have adequate triggers for when more detailed assessment is required.</p>	Amend Policy UD.2 so that it does not apply to resource consents.
New Policy UD.3	Support with amendment	<p>We support this direction to meet the requirements of clause 3.8(3) of the NPS-UD. However, the criteria could be improved and made more consistent with the goals of the NPS-UD:</p> <ul style="list-style-type: none"> <li>• To better provide for non-residential development,</li> <li>• To recognise there may be limitations in monitoring and this should not preclude applicants from providing the assessment instead,</li> </ul>	<p>Amend Policy UD.3 as follows:</p> <p><b>“Policy UD.3: Responsive planning to developments that provide for significant development capacity – consideration</b></p> <p>When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:</p>

Provision	Position	Reasons	Relief sought
		<ul style="list-style-type: none"> <li>• To avoid unnecessary assessment which is not necessary to determine if a proposal provides for significant development capacity,</li> <li>• To provide a standard for infrastructure provision that recognises that infrastructure capacity cannot always cleanly be assigned and limited to specific areas, and</li> <li>• To improve clarity</li> </ul>	<p>(a) the location, design and layout of the proposal:</p> <p>(i) contributes to establishing or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22,</p> <p>(ii) is well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors,</p> <p>(iii) <u>where it provides for housing the proposal</u> will apply a relevant residential zone or other urban zone that provides for high density development or medium density <del>residential</del> development,</p> <p>(b) the proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage <u>otherwise identified in monitoring</u> for:</p> <p>(i) a variety of housing that meets <del>the</del> <u>a</u> regional, district, or local <del>shortages</del> <u>shortage</u> of housing in relation to <del>the</del> <u>a</u> particular type, size, or format, or</p>

Provision	Position	Reasons	Relief sought
			<p>(ii) business space or land of a particular size or locational type, or</p> <p>(iii) community, cultural, health, or educational facilities, <del>and</del> <u>or</u></p> <p>(iv) the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and</p> <p>(c) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution:</p> <p>(i) is of high yield relative to either the forecast demand or the identified shortfall,</p> <p>(ii) will be realised in a timely (i.e., rapid) manner, <u>and</u></p> <p>(iii) is likely to be taken up, <u>and</u></p> <p><del>(iv) will facilitate a net increase in district-wide up-take in the short to medium term,</del></p> <p>(d) required development infrastructure can be provided effectively and efficiently for the proposal, <u>taking into account that the</u></p>



Provision	Position	Reasons	Relief sought
			<p><del>capacity provided by existing or committed infrastructure may already be needed for and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term.</del></p> <p><b>Explanation</b></p> <p>Policy UD.3 provides for responsiveness in considering significant development capacity under Policy 55(d) and outlines the criteria that need to be met for a development to be considered to provide 'significant development capacity' as required by Subpart 2 of the National Policy Statement on Urban Development 2020.”</p> <p>(See also our requested relief on definitions used in this policy).</p>

### Chapter 4.3 – Allocation of responsibilities

Provision	Position	Reasons	Relief sought
Amendment to Policy 61	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity (“NPS-IB”). The proposed provisions may well conflict with the NPS-IB	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
		<p>especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	
New Policy FW.6	Oppose	This policy is redundant as it simply repeats provisions of the RMA and NPS-FM.	Delete Policy FW.6.

#### **Chapter 4.4 – Non-regulatory policies**

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
New Policy CC.16	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy CC.16 to make it clear it does not apply to city and district councils.
New Policy CC.18	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy CC.18 to make it clear it does not apply to city and district councils.
Amendment to Policy 65	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy 65 to make it clear it does not apply to city and district councils.
New Policy FW.7	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.
New Policy FW.8	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.
New Policy IE.3	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy	Delete Policy IE.3

Provision	Position	Reasons	Relief sought
		<p>Statement on Indigenous Biodiversity (“NPS-IB”). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p> <p>It is also unclear what is achieved by a direction in the Regional Policy Statement that the Regional Policy Statement should be amended.</p>	
New Policy IE.4	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity (“NPS-IB”). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p> <p>We also oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.</p>	Delete Policy IE.4

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
Amendment to Policy 67	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy 67 to make it clear it does not apply to city and district councils.

#### **Chapter 4.5.1 – Regulatory Methods**

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
Amendment to Method 1	Support with amendment	Support insofar as any consequential amendments to the list of policies are made where we have sought the deletion of those policies.	Consequential amendment to the list of policies to reflect policies where we seek deletion.
Amendment to Method 3	Support	Support as proposed.	Retain amendments to Method 3 as drafted.
Amendment to Method 4	Support with amendment	The method is appropriate if the policies listed are modified so that they are less prescriptive and less complicated, and repeated statements of higher order requirements of the RMA and national policy statements are removed or, modified to have a clear relevance from a regional perspective or interpretation.	Consequential amendment to the list of policies to reflect policies where we seek deletion.

#### **Chapter 4.5.2 – Non-regulatory methods – information and guidance**

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
Amendment to Method 14	Support	Support as proposed	Retain amendments to Method 14 as drafted.
Deletion of Method 23	Support	Support as proposed	Delete Method 23 as proposed.
Deletion of Method 25	Support	Support as proposed	Delete Method 25 as proposed.

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
New Method UD.1	Oppose in relation to territorial authorities	<p>Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.</p> <p>It is also inappropriate for a method to direct action through the Wellington Regional Leadership Committee which is not a statutory body with responsibilities under the resource management system.</p>	Amend Method UD.1 to remove implementation by city and district councils and remove reference to the Wellington Regional Leadership Committee.

### Chapter 4.5.3 – Non-regulatory methods – integrating management

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
New Method IM.1	Oppose in relation to territorial authorities	<p>Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.</p> <p>See also our comments on proposed Policy IM.1</p>	<p>Amend Method IM.1 so that it does not apply to city and district councils.</p> <p>If the method is retained, amend by deleting clauses (f) and (g).</p>
New Method FW.2	Oppose	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Delete new Method FW.2
Amendment to Method 17	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 17 so that it does not apply to city and district councils.
Amendment to Method 22	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 22 so that it does not apply to city and district councils.
Deletion of Method 31	Support	Support as proposed	Delete Method 31 as proposed.
Amendment to Method 32	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 32 so that it does not apply to city and district councils.
Deletion of Method 33	Support	Support as proposed	Delete Method 33 as proposed.

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
Amendment to Method 34	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 34 so that it does not apply to city and district councils.
Deletion of Method 35	Support	Support as proposed	Delete Method 35 as proposed.
Deletion of Method 40	Support	Support as proposed	Delete Method 40 as proposed.
Amendment to Method 46	Oppose	<p>The term “complex development opportunity” is not adequately defined (see our comment on the definition) and the method is not adequately supported by higher order objectives and policies.</p> <p>We also oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.</p> <p>It is also inappropriate for a method to direct action through the Wellington Regional Leadership Committee which is not a statutory body with responsibilities under the resource management system.</p>	<p>Delete Method 46.</p> <p>If the method is retained, amend Method 46 so that it does not apply to city and district councils and remove reference to the Wellington Regional Leadership Committee.</p>
New Method UD.2	Oppose	This method is redundant as it is already a requirement of the National Policy Statement on Urban Development.	Delete Method UD.2

#### **Chapter 4.5.4 – Non-regulatory methods – identification and investigation**

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
New Method CC.4	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method CC.4 so that it does not apply to city and district councils.
New Method IE.2	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy	Delete Method IE.2

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
Amendment to Method 21	Oppose	<p>Statement on Indigenous Biodiversity (“NPS-IB”). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	<p>Retain existing Operative Method 21.</p> <p>Failing that, amend the deadline from 30 June 2025 to 5 years after RPS Change 1 becomes operative.</p>

#### **Chapter 4.5.5 – Non-regulatory methods – providing support**

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
Amendment to Method 53	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 53 so that it does not apply to city and district councils.
Amendment to Method 54	Oppose in relation to territorial authorities	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 53 so that it does not apply to city and district councils.
Deletion of Method 56	Support	Support as proposed	Delete Method 56 as proposed.

#### **Chapter 5 – Monitoring**

<b>Provision</b>	<b>Position</b>	<b>Reasons</b>	<b>Relief sought</b>
Chapter 5 – General	Neutral with amendments		Consequential amendments to reflect relief sought on related provisions.

## Appendices and Definitions

Provision	Position	Reasons	Relief sought
<b>Appendices</b>			
New Appendix 1A	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity (“NPS-IB”). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete Appendix 1A.
<b>Definitions</b>			
General	Various		Consequential amendments to definitions, deleted definitions, and new definitions as appropriate for our other requested relief.
“Complex development opportunity”	Oppose	It is inappropriate for a definition to outsource the meaning of a definition to a third party, in this case the Wellington Regional Leadership Committee, particularly regarding decisions to be made by that third party in future.	Delete definition. (Note our other relief would delete all uses of this term in the RPS in any case).
“High carbon passenger transport modes”	New definition (consequential)	<p>A definition for this term is needed to implement our requested relief for Policy CC.1</p> <p>See the discussion of the term “low and zero-carbon modes” for details.</p>	<p>New definition:</p> <p>“Means passenger transport modes that are not <i>low and zero-carbon modes</i>.”</p>
“High density development”	Support with amendment	The use of the term “minimum building height” is unclear. District plans do occasionally apply minimum	Amend as follows:



Provision	Position	Reasons	Relief sought
		<p>building height standards but typically provide a maximum or anticipated building height.</p>	<p>“Means areas used predominately for <del>commercial, residential and mixed use</del> <u>urban</u> activities with high concentration and bulk of buildings, such as apartments, and other compatible activities with <del>a minimum</del> <u>an anticipated</u> building height of <u>at least</u> 6 stories.”</p>
<p>“Low and zero-carbon modes”</p>	<p>New definition (consequential)</p>	<p>A definition for this term is needed for Policy CC.1 both as proposed and to implement our requested relief.</p> <p>We have not provided the text for a proposed definition because this is an area best drafted by the Regional Council for consistency with other plans, policies, and strategies. We would assume the definition would encompass at least walking, cycling, and some public transport. The degree to which the definition covers micromobility, fossil-fuelled public transport, or personal electric cars should be consistent with other strategies on mode shift covering funding.</p>	<p>Provide a definition for the term that aligns with the national Emissions Reduction Plan, Waka Kotahi/NZTA’s Regional Mode Shift Plan – Wellington, and other relevant strategies for mode shift.</p>
<p>“Medium density residential development”</p>	<p>Support with amendment</p>	<p>The use of the term “minimum building height” is unclear. District plans do occasionally apply minimum building height standards but typically provide a maximum or anticipated building height.</p> <p>In addition, the circumstances where this term is used either make it clear that the development is residential, or there is no policy reason to limit the development to being residential. It should be amended to be consistent with the term “high density development”.</p>	<p>Amend the term itself (and references):</p> <p>“Medium density <del>residential</del> development”</p> <p>And the definition:</p> <p>“Means areas used predominately for <del>residential</del> <u>urban</u> activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible activities with <del>a minimum</del> <u>an</u></p>

Provision	Position	Reasons	Relief sought
			<p><u>anticipated</u> building height of <u>at least</u> 3 stories.”</p> <p>And amend the term throughout the RPS when used.</p>
“Nature-based solutions”	Neutral with amendment	This definition is not clear enough to provide direction to plan users. The need for a significant number of examples illustrates this.	Amend the definition to provide clarity about what is covered by the term.
“Regionally significant centres”	Support	Support the amendments to the definition as proposed.	Amend the definition as proposed.
“Urban areas”	Support with amendment	Support but seek amendment to be consistent with the term used for our district plan: the City of Lower Hutt District Plan.	Instead of amending to “ <del>Lower</del> Hutt city”, amend as “ <u>City of</u> Lower Hutt <del>city</del> ”.