

Appendix 2: Submission Summary Recommendation Table – Hearing Stream 5

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S17.002	Chelsea Kershaw			S17.002	Chelsea Kershaw	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.	Accept in part
S22.002	Tegan McGowan			S22.002	Tegan McGowan	General comments - fresh water	Support	Support provisions for uplifting Te Mana o Te Wai.	Retain, refine and enhance provisions.	Accept in part
S24.002	Helen Payn			S24.002	Helen Payn	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.	Accept in part
S25.010	Carterton District Council			S25.010	Carterton District Council	General comments - fresh water	Support	CDC supports the inclusion of these statements, but it is unclear what purpose they serve in the RPS - better linkages with other objectives or policies would be useful to better understand how to give effect to the statements.	(Submission point in reference to - Rangitāne o Wairarapa and Kahungunu ki Wairarapa Table 4, Chapter 3.4) Provide better linkages between these statements and the rest of the RPS.	Accept
S25.010	Carterton District Council	FS2.102	Rangitāne o Wairarapa Inc	FS2.102	Rangitāne o Wairarapa Inc	General comments - fresh water	Support in part	Rangitāne o Wairarapa support Carterton District Council's request that better linkages are provided between the Te Mana o te Wai statements and the rest of the RPS. Rangitāne o Wairarapa wishes to partner with GRWC to improve these linkages.	Allow in part	Accept
S25.010	Carterton District Council	FS28.020	Horticulture New Zealand	FS28.020	Horticulture New Zealand	General comments - fresh water	Support	HortNZ agree that the way that the Te Mana o Te Wai statements are integrated into the RPS could be clearer for plan users.	Allow Allow amendment to add clarity to the linkage between Te Mana o Te Wai statements and the rest of the RPS	Accept
S28.003	Philippa Yasbek			S28.003	Philippa Yasbek	General comments - fresh water	Support	Support provisions for Te Mana o te Wai.	Retain as notified.	Accept in part
S32.004	Director-General of Conservation			S32.004	Director-General of Conservation	General comments - fresh water	Support in part	The proposed changes recognise Te Mana o te Wai, which is appropriate under the NPSFM, as is the inclusion of iwi statements.	Retain as notified, except to amend Policy 12 to clarify how iwi statements are to be applied.	Accept in Part

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								However, the structure of the proposed Objective 12 includes the iwi statements under the six principles which Te Mana o te Wai encompasses, which is not an accurate reflection of the NPSFM. This means it is unclear to plan users how those iwi statements are to be applied when implementing the RPS.		
S32.004	Director-General of Conservation	FS20.004	Ātiawa ki Whakarongotai Charitable Trust	FS20.004	Ātiawa ki Whakarongotai Charitable Trust	General comments - fresh water	Support in part	Ātiawa support iwi/mana whenua statements inclusion in Objective 12. Ātiawa support in part, providing further clarity on how iwi/mana whenua statements are to be applied, iwi/mana whenua statements are a mechanism to give effect to the NPS-FM and Te Mana o te Wai.	Allow in part Allow in part. Ātiawa seek that the council partner with mana whenua to ensure their statements are applied as intended by mana whenua in keeping with resource management legislation.	Accept in Part
S32.004	Director-General of Conservation	FS30.282	Beef + Lamb New Zealand Ltd	FS30.282	Beef + Lamb New Zealand Ltd	General comments - fresh water	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the	Disallow	Reject

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								inefficient implementation and confusion amongst those who it impacts materially.		
S35.005	Oliver Bruce			S35.005	Oliver Bruce	General comments - fresh water	Support	Support provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.	Accept in part
S37.005	Jennifer Van Beynen			S37.005	Jennifer Van Beynen	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.	Accept in part
S51.006	Khoi Phan			S51.006	Khoi Phan	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.	Accept in part
S53.005	Ellen Legg			S53.005	Ellen Legg	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai	Retain as notified.	Accept in part
S60.006	Grant Buchan			S60.006	Grant Buchan	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.	Accept in part
S61.006	Patrick Morgan			S61.006	Patrick Morgan	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.	Accept in part
S62.015	Philip Clegg			S62.015	Philip Clegg	General comments - fresh water	Support in part	This policy appears to be inconsistent with the national-level Freshwater Fisheries Regulations. The RPS should not require people to do anything that will incur additional compliance costs or liability under the Regulations.	Amend Policy 10 to resolve inconsistencies with the Freshwater Fisheries Regulations.	Reject
S71.004	Parents for Climate Aotearoa			S71.004	Parents for Climate Aotearoa	General comments - fresh water	Support	It is not acceptable to continue practices that harm our waterways and biodiversity. We support changes to ensure we are protecting our natural environment for the health and wellbeing of all.	Retain the strong provisions on freshwater, including the provisions related to Te Mana o te Wai and the environmental bottom lines related to freshwater pollution.	Accept in part

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S73.003	Alicia Hall			S73.003	Alicia Hall	General comments - fresh water	Support	I support maintaining the strong provisions on freshwater, including Te Mana o te Wai, Blue Belt and preventing freshwater pollution.	Retain as notified.	Accept in part
S74.003	Finn Hall			S74.003	Finn Hall	General comments - fresh water	Support	It would be really good if the regional council could make sure we stop polluting our waterways. Our family loves camping in summer and sometimes we are near streams and rivers that aren't safe to swim in. So I support good freshwater provisions like the important Te Mana o te Wai and looking after our environment and biodiversity better.	Retain as notified	Accept in part
S75.003	Te Aka Tauira - Victoria University of Wellington Students Association (VUWSA)			S75.003	Te Aka Tauira - Victoria University of Wellington Students Association (VUWSA)	General comments - fresh water	Support	<p>Supports the maintenance of strong provisions on freshwater including the provisions related to Te Mana o Te Wai and the environmental bottom lines related to freshwater pollution. Te Tiriti should be upheld in freshwater policy through stringent pollution targets. The important relationship between freshwater and iwi must be recognised and reflected in regulation and consulting policies.</p> <p>Support for ambitious freshwater guidelines that serve a healthy community.</p> <p>Support for implementation of the National Policy Statement on Freshwater Management to work towards improving degraded water bodies and preventing further degradation of wetlands and streams.</p> <p>Supports the integration of Te Mana o Te Wai in freshwater management. This is about recognising the importance of freshwater ecosystems</p>	Retain as notified.	Accept in part

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								and communities relying on them for health and well-being.		
S80.004	Anders Crofoot			S80.004	Anders Crofoot	General comments - fresh water	Oppose	Issues would be better reviewed in their entirety in the 2024 RPS review.	Delete all the proposed amendments including all text, objective 12 and Table 4.	Reject
S80.004	Anders Crofoot	FS2.135	Rangitāne o Wairarapa Inc	FS2.135	Rangitāne o Wairarapa Inc	General comments - fresh water	Oppose	<p>The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.</p> <p>Rangitāne o Wairarapa supports the intent of the freshwater provisions in this plan change, but consider that additional work is needed to reflect Rangitāne o Wairarapa's vision for freshwater in a way that is clear and readily implementable. Rangitāne o Wairarapa considers that additional work is needed to fully and accurately give effect to the direction in the NPS FM that will ensure we get real change on the ground.</p>	Disallow	Accept
S80.004	Anders Crofoot	FS30.003	Beef + Lamb New Zealand Ltd	FS30.003	Beef + Lamb New Zealand Ltd	General comments - fresh water	Support	B+LNZ support that regional and national policy statements and plans are created in a streamlined way that avoids duplication of review processes.	Allow	Reject

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S92.002	Ruby Miller-Kopelov			S92.002	Ruby Miller-Kopelov	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.	Accept in part
S93.002	Isabella Cawthorn			S93.002	Isabella Cawthorn	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.	Accept in part
S94.010	Guardians of the Bays Incorporated			S94.010	Guardians of the Bays Incorporated	General comments - fresh water	Support	Not stated	Retain as notified	Accept in part
S98.006	Teresa Homan			S98.006	Teresa Homan	General comments - fresh water	Support	Te Awa Kairangi and all water catchments must be protected and revitalised as priority in any district plan.	Amend provisions to address relief sought in submission.	Accept in part
S113.020	Wellington Water			S113.020	Wellington Water	General comments - fresh water	Support in part	There is an overlap between GW and District and City Councils regarding the control of land use for water quality. This is critical for delivery of our upcoming stormwater consent application. Provisions addressing the overlap must be clear about the extent of mutual responsibilities, and avoid the risk of regional or territorial authorities individually taking less responsibility due to mutual obligations. This applies generally and particularly to Policy 14, Policy 15, Policy FW.3 Policy FW.6 and Policy 41.	Clarify district, city and regional councils' roles and functions regarding water quality, including the extent of mutual responsibilities.	Accept in part
S113.020	Wellington Water	FS13.0010	Wellington City Council	FS13.0010	Wellington City Council	General comments - fresh water	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow	Accept in part

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S113.048	Wellington Water			S113.048	Wellington Water	General comments - non-regulatory methods	Not Stated / Neutral	Increased urban development is required by the NPS- UD. This has implications for water quality which need to be addressed under the NPS- FM. The proposed method is a first step in reconciling the two NPS outcomes for wastewater.	Insert new Method 57: Method 57: Develop and implement a wastewater management strategy, in partnership with mana whenua/tangata whenua and in collaboration with territorial authorities and water infrastructure providers. The strategy shall: <ul style="list-style-type: none"> • Recognise the 100 year journey to improve water quality • Set out how to achieve Te Mana o te Wai when managing wastewater • Recognise that the journey may look different in different whaitua or for different mana whenua groups • Be informed by the WIPs and associated documents from mana whenua groups (eg Te Mahere Wai or iwi statements) • Create a framework of priorities and recognise that those priorities will change on the 100 year journey • Result in a planning framework that both implements the NPS- FM and provides appropriate levels of flexibility for this early stage of the 100 year journey 	Reject
S113.048	Wellington Water	FS6.007	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	FS6.007	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	General comments - non-regulatory methods	Support	We support this submission as the suggested method of developing and implementing a wastewater strategy in partnership with mana whenua will support the aspirations and values of mana whenua in relation to wastewater management.	Allow	Reject

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S113.049	Wellington Water			S113.049	Wellington Water	General comments - non-regulatory methods	Not Stated / Neutral	Te Mana o te Wai is reliant on consistent application of the principles listed in the NPS-FM. The provision of water services in Wellington is subject to increasing regulation and additional regulators. As well as a public health and environmental regulator, an economic regulator is expected to be established by 2025. Wellington Water considers it would be beneficial for water services regulators to work together in an integrated manner.	Insert new Method 58 Method 58: Engage with Taumata Arowai and the water services economic regulator (when established) to ensure a consistent approach to Te Mana o te Wai, including consideration of limits, measures, targets and relationships, particularly where there are overlaps in functions and roles.	Accept
S126.008	Templeton Kapiti Limited (TKL)			S126.008	Templeton Kapiti Limited (TKL)	General comments - fresh water	Support	The TKL Land could implement the fresh water amendments.	Retain as notified.	Accept in part
S131.004	Ātiawa ki Whakarongotai Charitable Trust			S131.004	Ātiawa ki Whakarongotai Charitable Trust	General comments - fresh water	Support	Ātiawa notes that Regional Council have earlier signalled that RPS Change 1 will include limited provisions to that give effect in part to the National Policy Statement for Freshwater Management 2020 (the NPS-FM); a separate freshwater plan change process will be publicly notified by Regional Councils on, or prior to 31 December 2024, to fully give effect to the requirements of the NPS-FM.	Ātiawa are concerned at the interim effect of RPS Change 1 where proposed provisions are dependent on other provisions that are yet to be determined through a freshwater plan change process. For example, Policy 18 and Policy 41 relate to managing freshwater in a way that achieves 'target attribute states for water bodies and freshwater ecosystems'. However, target attribute states for the Kāpiti rohe will not be set until the freshwater plan change process and Te Whaitua o Kāpiti are completed, Te Whaitua o Kāpiti will formally commence in November/December 2022.	No recommendation
S131.004	Ātiawa ki Whakarongotai Charitable Trust	FS30.006	Beef + Lamb New Zealand Ltd	FS30.006	Beef + Lamb New Zealand Ltd	General comments - fresh water	Support in part	B+LNZ agree with the concerns raised on partial implementation of the NPSFM2020 and consider it would be more efficient and effective to wait until the freshwater plan change processes have been completed to	Allow in part	No recommendation

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								ensure they are adequately informed by the necessary engagement required under Part 3.2 of the NPSFM2020.		
S131.004	Ātiawa ki Whakarongotai Charitable Trust	FS19.001	Wellington Water Ltd ("Wellington Water")	FS19.001	Wellington Water Ltd ("Wellington Water")	General comments - fresh water	Support in part	Agree that the interim effect is not understood, however any changes need to be carefully considered as much of the work is currently underway rather than being complete.	Allow in part Accept with changes	No recommendation
S131.004	Ātiawa ki Whakarongotai Charitable Trust	FS28.021	Horticulture New Zealand	FS28.021	Horticulture New Zealand	General comments - fresh water	Support in part	HortNZ agree with the concerns that some provisions are dependent on other provisions that are yet to be determined.	Allow in part Allow amendments which add clarity to the implementation of provision that rely on yet-to-occur processes	No recommendation
S131.004	Ātiawa ki Whakarongotai Charitable Trust	FS29.208	Ngā Hapu o Otaki	FS29.208	Ngā Hapu o Otaki	General comments - fresh water	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to</p>	Not stated	No recommendation

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								<p>maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S133.004	Muaūpoko Tribal Authority			S133.004	Muaūpoko Tribal Authority	General comments - fresh water	Oppose	As currently drafted, the freshwater provisions do not adequately incorporate the local expressions of Te Mana o te Wai. A thorough review of the provisions needs to be undertaken to ensure the expressions are reflected accurately and	All freshwater provisions need to be reconsidered and updated to better incorporate Te Mana o te Wai expressions and include Muaūpoko values, attributes and outcomes.	Accept in part

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								appropriately, and achieve the desired outcomes for iwi and the region.		
S133.004	Muaūpoko Tribal Authority	FS2.125	Rangitāne o Wairarapa Inc	FS2.125	Rangitāne o Wairarapa Inc		Support in part	Rangitāne o Wairarapa support the request to include Te Mana o te Wai expressions from other iwi, however we do not consider this needs to delay the current process.	Allow in part	Accept in part
S133.004	Muaūpoko Tribal Authority	FS6.068	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	FS6.068	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira		Oppose	We oppose this submission because as Muaūpoko claims are inappropriate. This not only causes confusion around which iwi are Tangata Whenua in Te Whanganui a Tara rohe and which iwi to engage with, but also portrays a false perception of who the mana whenua are, which is also inappropriate.	Disallow We seek that this part of the submission is disallowed.	Accept in part
S133.004	Muaūpoko Tribal Authority	FS20.351	Ātiawa ki Whakarongotai Charitable Trust	FS20.351	Ātiawa ki Whakarongotai Charitable Trust		Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being	Disallow Disallow the whole submission	Accept in part

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								<p>kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.</p>		

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S136.002	DairyNZ			S136.002	DairyNZ	General comments - fresh water	Oppose	<p>Considers any plan change that is intended for the RPS to 'give effect to' the NPS-FM should include the other components the NPS-FM also requires of the RPS; including freshwater visions and supporting values, and related objectives and policies. An integrated process of this nature is vital for providing an informed discussion to allow the setting of clear direction for freshwater management in the region.</p> <p>A more effective and efficient process would be to delay the changes to the RPS, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1,2 and 3). Resulting in one Freshwater Planning process once when making all the required changes to give effect to the NPS-FM 2020, and would more appropriately give effect to the NPS-FM requirements outlined at 3.2.</p>	Delete changes and address issues through a full review of the RPS.	Reject
S136.002	DairyNZ	FS2.4	Rangitāne o Wairarapa Inc	FS2.4	Rangitāne o Wairarapa Inc	General comments - fresh water	Oppose	<p>The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.</p> <p>Rangitāne o Wairarapa supports the intent of the freshwater provisions in</p>	Disallow	Accept

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								this plan change, but consider that additional work is needed to reflect Rangitāne o Wairarapa's vision for freshwater in a way that is clear and readily implementable. Rangitāne o Wairarapa considers that additional work is needed to fully and accurately give effect to the direction in the NPS FM that will ensure we get real change on the ground.		
S136.002	DairyNZ	FS30.008	Beef + Lamb New Zealand Ltd	FS30.008	Beef + Lamb New Zealand Ltd	General comments - fresh water	Support	B+LNZ agree it is inefficient to widen the scope of matters outside those required to give effect to the NPS-UD until such time as the necessary engagement has been completed and there is certainty with important national legislation for the NPS-IB and climate change.	Allow	Reject
S136.022	DairyNZ			S136.022	DairyNZ	General comments - fresh water	Oppose	The NPS-FM directs (at 3.2(1)) that every regional council must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region. The changes in PC1 to the RPS do not provide any greater clarity or direction on how Te Mana o te Wai applies to freshwater in the region.	Undertake further consultation to determine how Te Mana o te Wai applies to freshwater in the region.	Reject
S136.022	DairyNZ	FS2.111	Rangitāne o Wairarapa Inc	FS2.111	Rangitāne o Wairarapa Inc	General comments - fresh water	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept for mana whenua and although some iwi have contributed to the articulation of Te Mana o te Wai in the proposed changes to the RPS, others have chosen to define this through their Whaitua process, as they see fit. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We	Disallow	Accept

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								need action now for our future generations. Further consultation will occur through the NOF process in the NPS.		
S136.022	DairyNZ	FS30.024	Beef + Lamb New Zealand Ltd	FS30.024	Beef + Lamb New Zealand Ltd	General comments - fresh water	Support	B+LNZ supports further consultation to determine how Te Mana o te Wai applies to freshwater in the region.	Allow	Reject
S136.022	DairyNZ	FS28.022	Horticulture New Zealand	FS28.022	Horticulture New Zealand	General comments - fresh water	Support	HortNZ support further work to add to how Te Mana o Te Wai applies on the regional context.	Allow	Reject
S137.002	Greater Wellington Regional Council (GWRC)			S137.002	Greater Wellington Regional Council (GWRC)	General comments - fresh water	Support in part	<p>The National Policy Statement for Freshwater Management (NPS-FM) requires the regional council to not delay and implement the NPS-FM as soon as reasonably practicable. Section 3.3(1) requires that "every regional council must develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement."</p> <p>The regional council did not include vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in Proposed RPS Change 1 due to the desire to enable a truly partnered approach to the plan change development which was ultimately constrained by time.</p> <p>A number of parties have questioned this decision and expressed their expectation that freshwater vision objectives should have been included in the Proposed RPS Change 1. The regional council now seeks to include through submissions freshwater vision (to give effect to the NPS-FM 2020) objectives for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p>	<p>Insert freshwater vision for Te Awarua-o-Porirua into Chapter 3.4, as shown below:</p> <p>Objective 12A: Freshwater vision for Te Awarua-o-Porirua The health and wellbeing of Te Awarua-o-Porirua and all of the waterbodies and ecosystems within Te Awarua-o-Porirua Whaitua are restored, their waters are healthy and future generations are sustained, physically and culturally. Such that within 20 years:</p> <p>(a) The harbour, waterbodies and coast are clean and brimming with life and have diverse and healthy ecosystems, (b) The harbour, waterbodies and coast can be used to gather and catch kaimoana and mahinga kai, (c) The harbour, waterbodies and coast flow naturally and with energy, attracting people to connect with them, (d) The harbour, waterbodies and coast are safe and accessible for people to enjoy and undertake recreational activities, (e) Te Awarua-o-Porirua is recognised (acknowledged and</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								The visions in this submission have come from the whaitua processes for these whaitua, through input from community and mana whenua / tangata whenua.	protected) as an ancestral treasure of Ngāti Toa Rangatira, (f) Ngāti Toa Rangatira are able to exercise its kaitiakitanga and are integral to a partnership model for the ongoing protection of the harbour and its waterways, and (g) Land is developed, used and managed to maintain or restore natural hydrology and habitat, reduce contaminant losses and minimise creation of contaminants.	
S137.002	Greater Wellington Regional Council (GWRC)	FS2.104	Rangitāne o Wairarapa Inc	FS2.104	Rangitāne o Wairarapa Inc	General comments - fresh water	Support in part	Rangitāne support the insertion of the freshwater vision for Te Awarua-o-Porirua into Chapter 3.4 proposed by GWRC provided this is accepted by mana whenua.	Allow in part	Reject
S137.002	Greater Wellington Regional Council (GWRC)	FS22.001	Director-General of Conservation / Tumuaki Ahurei	FS22.001	Director-General of Conservation / Tumuaki Ahurei	General comments - fresh water	Support in part	The inclusion of FMU-specific freshwater visions is appropriate under the NPSFM, and supported by the D-G. However, as this vision has been introduced through the submission process, it is not clear why the specific content is proposed, nor why there are differences between this and other freshwater visions. Review is therefore sought to ensure that this vision is appropriate, and is consistent and integrated with the wider RPS vision framework.	Allow in part Allow in part, with review to ensure that this vision is appropriate, and is consistent and integrated with the wider RPS vision framework.	Reject
S137.002	Greater Wellington Regional Council (GWRC)	FS30.026	Beef + Lamb New Zealand Ltd	FS30.026	Beef + Lamb New Zealand Ltd	General comments - fresh water	Oppose	B+LNZ submitted that to include freshwater provisions before the Whaitua process has been concluded is premature and the section 32 report describes the Whaitua process to inform and support the preparation of regional plan and	Disallow	Accept

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								regional policy statement provisions to give effect to the requirements of the NPSFM. Where Whaitua processes have not yet concluded it cannot be said that the proposed PC1 freshwater policies are fully informed by the outcomes of Whaitua engagement process. B+LNZ questions the appropriateness of Council submitting to insert vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in the Proposed RPS while acknowledging that they were not originally included due to the desire to enable a 'truly partnered approach to the plan change development'.		
S137.002	Greater Wellington Regional Council (GWRC)	FS19.014	Wellington Water Ltd ("Wellington Water")	FS19.014	Wellington Water Ltd ("Wellington Water")	General comments - fresh water	Support in part	The 20 year timeframe is unachievable. Where there are existing activities that impact on these outcomes, progressive improvement should be required.	Allow in part Accept with changes	Reject
S137.002	Greater Wellington Regional Council (GWRC)	FS15.008	DairyNZ	FS15.008	DairyNZ	General comments - fresh water	Oppose	DairyNZ considers further community engagement is required to determine freshwater visions at the FMU scale.	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S137.003	Greater Wellington Regional Council (GWRC)			S137.003	Greater Wellington Regional Council (GWRC)	General comments - fresh water	Support in part	<p>The NPS-FM requires the regional council to not delay and implement the NPS-FM as soon as reasonably practicable. Section 3.3(1) requires that "every regional council must develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement."</p> <p>The regional council did not include vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in Proposed RPS Change 1 due to the desire to enable a truly partnered approach to the plan change development which was ultimately constrained by time.</p> <p>A number of parties have questioned this decision and expressed their expectation that freshwater vision objectives should have been included in the Proposed RPS Change 1. The regional council now seeks to include through submissions freshwater vision (to give effect to the NPS-FM 2020) objectives for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p> <p>The visions in this submission have come from the whaitua processes for these whaitua, through input from community and mana whenua / tangata whenua.</p>	<p>Insert freshwater vision for Whaitua te Whanganui-a-Tara into Chapter 3.4, as shown below:</p> <p>Objective 12B: Freshwater vision for Whaitua te Whanganui-a-TaraAll freshwater bodies in Te Whanganui-a-Tara are wai ora and estuarine areas are healthy and functioning within 100 years, including:</p> <p>(a) The āhua of the Korokoro, Kaiwharawhara, Te Awa Kairangi, Wainuiomata, and Ōrongorongo Awa and Parangārehu Lakes is fully restored</p> <p>(b) Mana Whenua are the lead agency and regulator for protection and restoration of wai ora in 20 to 50 years' time</p> <p>(c) Tamariki support mātua, tuākana and whānau, hapū and iwi to restore and protect awa using tools like iwi kaitiaki plans within 20 years.</p> <p>(d) Pakeke are active in paid mana whakahaere roles overseeing monitoring, management, and improvement of wai ora in 20 years.</p> <p>(e) Taiohi are active kaitiaki and kaikohikai in the wider catchment and are inducted into wai ora monitoring programmes like Ngā Mangai Waiora (ambassadors for water) within 20 years.</p> <p>(f) All waterbodies in Te Whanganui-a-Tara are suitable for primary contact/kaukau (swimming) by 2041.</p> <p>(g) Native fish have access to move freely up and down the entire length of the catchment to complete their life cycle within 20 years.</p> <p>(h) Iwi can safely harvest and eat (identified species) of local</p>	Reject

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									<p>mahinga kai throughout the catchment in 20 years.</p> <p>(i) Mahinga kai species are plentiful enough in all catchments for long term harvest including for manuhiri and to exercise manaakitanga within 20 years.</p> <p>(j) The mauri/mouri and life-supporting capacity of water in Te Whanganui-a-Tara enables the customary practices of Mana Whenua such as tohi, whakarite, whakawātea manaakitanga at a range of places throughout the whitua.</p> <p>(k) The mana of water as a source of life is restored including regarding and respecting all waterbodies (including āku waiheke), repo (wetland) and estuaries as living entities,</p> <p>(l) All freshwater bodies are allowed to exhibit their natural rhythms, natural form, hydrology and character, including through a range of flows over the seasons.</p> <p>(m) There are sufficient flows and levels to support connectivity throughout mai i uta ki tai and between rivers and their banks to support spawning fish.</p> <p>(n) Key areas such as te mātāpuna (headwaters), estuaries and repo (wetland) are protected and restored so that they support healthy functioning ecosystems.</p>	
S137.003	Greater Wellington Regional Council (GWRC)	FS2.105	Rangitāne o Wairarapa Inc	FS2.105	Rangitāne o Wairarapa Inc	General comments - fresh water	Support in part	Rangitāne support the insertion of the freshwater vision for Whitua te Whanganui-a-Tara into Chapter 3.4 proposed by GWRC provided this is accepted by mana whenua.	Allow in part	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S137.003	Greater Wellington Regional Council (GWRC)	FS22.002	Director-General of Conservation / Tumuaki Ahurei	FS22.002	Director-General of Conservation / Tumuaki Ahurei	General comments - fresh water	Support in part	The inclusion of FMU-specific freshwater visions is appropriate under the NPSFM, and supported by the D-G. However, as this vision has been introduced through the submission process, it is not clear why the specific content is proposed, nor why there are differences between this and other freshwater visions. Review is therefore sought to ensure that this vision is appropriate, and is consistent and Allow in part, with review to ensure that this vision is appropriate, and is consistent and integrated with the wider RPS vision framework.	Allow in part Allow in part, with review to ensure that this vision is appropriate, and is consistent and integrated with the wider RPS vision framework.	Reject
S137.003	Greater Wellington Regional Council (GWRC)	FS30.027	Beef + Lamb New Zealand Ltd	FS30.027	Beef + Lamb New Zealand Ltd	General comments - fresh water	Oppose	B+LNZ submitted that to include freshwater provisions before the Whaitua process has been concluded is premature and the section 32 report describes the Whaitua process to inform and support the preparation of regional plan and regional policy statement provisions to give effect to the requirements of the NPSFM. Where Whaitua processes have not yet concluded it cannot be said that the proposed PC1 freshwater policies are fully informed by the outcomes of Whaitua engagement process. B+LNZ questions the appropriateness of Council submitting to insert vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in the Proposed RPS while acknowledging that they were not originally included due to the desire to enable a 'truly partnered approach to the plan change development'.	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S137.003	Greater Wellington Regional Council (GWRC)	FS19.015	Wellington Water Ltd ("Wellington Water")	FS19.015	Wellington Water Ltd ("Wellington Water")	General comments - fresh water	Support in part	Not all the timeframes are achievable. Where there are existing activities that impact on these outcome, progressive improvement should be required.	Allow in part	Reject
S137.003	Greater Wellington Regional Council (GWRC)	FS15.009	DairyNZ	FS15.009	DairyNZ	General comments - fresh water	Oppose	DairyNZ considers further community engagement is required to determine freshwater visions at the FMU scale.	Disallow	Accept
S139.003	Ian Gunn			S139.003	Ian Gunn	General comments - fresh water	Support in part	It is time Doc, Iwi Councils a agreed a best practise management operation for the ranges to both reduce flood risk and improve water resilience.	Develop best practice management between DOC, iwi and councils to reduce flood risk and improve water resilience.	Reject
S139.013	Ian Gunn			S139.013	Ian Gunn	General comments - fresh water	Support	Include a permitted activity to create wetlands/bunds/dams to form a network of nature based solutions.	Require district plans to include rules that enable wetlands, bunds and dams to form a network of nature based solutions.	Reject
S141.007	Generation Zero Wellington			S141.007	Generation Zero Wellington	General comments - fresh water	Support	<p>Supports the freshwater provisions in the proposed changes to the RPS. Believe that freshwater should first and foremost be considered by the value that it gives to the community and this should be placed before any value to be gained through any extractive processes.</p> <p>Support the strong stance provided by the environmental bottom lines in relation to freshwater pollution and all the provisions related to Te Mana o Te Wai. We also believe that Te Tiriti should play an important role in the construction of any freshwater policy and the relationship between Māori and these bodies of water should be reflected in the delivery of those policies.</p>	Retain as notified.	Accept in part

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S148.005	Wellington International Airport Ltd (WIAL)			S148.005	Wellington International Airport Ltd (WIAL)	General comments - fresh water	Not Stated / Neutral	There are a number of new freshwater related objectives and policies within the change to the RPS which seek to give effect to the National Policy Statement for Freshwater Management 2020 ("NPSFM"). Some of the provisions however also refer to the coastal marine area / coastal environment. WIAL is concerned that this will result in the management of the coastal resources which is inconsistent with the New Zealand Coastal Policy Statement ("NZCPS") and the remaining sections of the RPS which are not subject to this Proposal. It will also apply freshwater management concepts to the coastal marine area and the coastal environment which is not appropriate.	Any reference to the coastal marine area / coastal environment is deleted from those provisions which seek to directly give effect to the NPSFM.	Accept
S152.007	Michelle Ducat			S152.007	Michelle Ducat	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Provisions should be retained, refined and enhanced.	Accept in part

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S157.023	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.023	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	General comments - regulatory policies	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks</p>	Amend Policies 14, FW.3 and 42 to recognise that the absolute thresholds set within the policy will not necessarily be achievable in all situations and there is a need for an element of discretion.	Accept in part

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								<p>and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it</p>		

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								<p>will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		
S162.034	Winstone Aggregates			S162.034	Winstone Aggregates	General comments - definitions	Not Stated / Neutral	Winstone notes that the new definitions appear to be focused on indigenous biodiversity and do not appear to introduce definitions required by NPS-FM. This appears to be inconsistent. The introduced policies and objectives in PPC1 do use terms referred to and defined in NPS-FM and therefore those terms should be included and defined in the RPS.	NPS-FM definitions and any updated definitions are added to the plan.	Accept in part
S162.034	Winstone Aggregates	FS11.029	Fulton Hogan Limited	FS11.029	Fulton Hogan Limited	General comments - definitions	Support	Definitions within the NPS-FM should be included within the RPS, or reference made to the NPS-FM definitions, within the RPS	Allow	Accept in part

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S162.034	Winstone Aggregates	FS20.302	Ātiawa ki Whakarongotai Charitable Trust	FS20.302	Ātiawa ki Whakarongotai Charitable Trust	General comments - definitions	Oppose	<p>Ātiawa oppose the submissions from Aggregate and Quarry Association and Winstone Aggregates to the extent that the relief sought is inconsistent with national direction, particularly the NPS-FM.</p> <p>Ātiawa are particularly sensitive to aggregate extraction from awa, it is mana whenua who are guaranteed tino rangatiratanga over the land, waterways and all other taonga (including aggregate) through Te Tiriti o Waitangi. Historically aggregate extraction industry has failed to uphold the articles and the principles of Te Tiriti. Additionally, aggregate extraction has adverse effects on te taiao and mana whenua values.</p> <p>On the matter of 'balancing' national policy statements', recent case law states that the NPS-FM 2020 and NPS-UD 2020 are to be read together and reconciled under the regional policy statement and the district plans. It goes on to say, development capacity does not outweigh (trump) Te Mana o te Wai. Te Mana o te Wai is the fundamental concept of freshwater management: any thinking to the converse would not give effect to either national policy statement. Therefore, to reconcile national direction, it is not a balancing act, or even a compromise, the NPS-FM must be given effect to while achieving the purpose of the NPS-UD for example. This can be applied to aggregate extraction, the activity must be consistent with Te Mana o te Wai and the NPS-FM. The need for housing</p>	Disallow	Accept in part

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								capacity is not license to forgo the requirements of the NPS-FM.		
S163.022	Wairarapa Federated Farmers			S163.022	Wairarapa Federated Farmers	General comments - fresh water	Oppose	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 whitua in 2023.	That the proposed amendments to Chapter 3.4 be deleted	Reject
S163.022	Wairarapa Federated Farmers	FS2.113	Rangitāne o Wairarapa Inc	FS2.113	Rangitāne o Wairarapa Inc	General comments - fresh water	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept for mana whenua and although some iwi have contributed to the articulation of Te Mana o te Wai in the proposed changes to the RPS, others have chosen to define this through their Whitua process, as they see fit. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow	Accept
S163.022	Wairarapa Federated Farmers	FS19.051	Wellington Water Ltd ("Wellington Water")	FS19.051	Wellington Water Ltd ("Wellington Water")	General comments - fresh water	Oppose	It is useful to have clarity about Te Mana o te Wai.	Disallow	Accept
S163.022	Wairarapa Federated Farmers	FS15.0010	DairyNZ	FS15.0010	DairyNZ	General comments - fresh water	Support	DairyNZ agrees further community engagement is required to determine freshwater visions at the FMU scale,	Allow	Reject

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								and that the proposed amendments to Chapter 3.4 should be deleted.		
S163.022	Wairarapa Federated Farmers	FS7.066	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.066	Royal Forest and Bird Protection Society (Forest & Bird)	General comments - fresh water	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept in part
S163.022	Wairarapa Federated Farmers	FS20.188	Ātiawa ki Whakarongotai Charitable Trust	FS20.188	Ātiawa ki Whakarongotai Charitable Trust	General comments - fresh water	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
S163.022	Wairarapa Federated Farmers	FS29.039	Ngā Hapu o Otaki	FS29.039	Ngā Hapu o Otaki	General comments - fresh water	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that	Not stated	Accept in part

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								<p>Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>		
S163.022	Wairarapa Federated Farmers	FS30.095	Beef + Lamb New Zealand Ltd	FS30.095	Beef + Lamb New Zealand Ltd	General comments - fresh water	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Reject
S164.005	Megan Lane			S164.005	Megan Lane	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Provisions should be retained, refined and enhanced.	Accept in part
S165.018	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.018	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	General comments - fresh water	Support	NPSFM clause 3.3(1) requires every regional council develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement. Forest & Bird notes the GWRC has not included long-term visions, but that appropriate visions could be taken and adapted from Te	Include long-term visions for freshwater at the FMU level from Te Mahere Wai o Te Kāhui Taiao, insofar as these give effect to the objective and policies of the NPSFM.	Reject

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								<p>Mahere Wai o Te Kāhui Taiao: Greater Wellington Regional Council -- Te Mahere Wai recommendations.</p> <p>[Note submission references Clause 3.3(1) - NPSFM]</p>		
S165.018	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.062	Ātiawa ki Whakarongotai Charitable Trust	FS20.062	Ātiawa ki Whakarongotai Charitable Trust	General comments - fresh water	Support	Ātiawa support the recognised mana whenua of the Wellington region expressing Te Mana o te Wai relevant to their rohe.	Allow	Reject
S165.018	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	General comments - fresh water	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	Disallow	Accept

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S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	General comments - fresh water	Support	<p>NPSFM clause 3.3 requires visions to be ambitious and clear on what the outcomes to be achieved are - noting that they are to be difficult to achieve but not impossible. There is currently no overarching vision for which the specific FMU visions are set to achieve. Forest & Bird notes the requirement to work with mana whenua and communities on developing FMU visions. The relevant goals within any vision objectives should all be achieved by, at most, 2040. Forest & Bird supports retaining shorter timeframes at the FMU level where these are proposed.</p> <p>Forest & Bird proposes an overarching vision for all FMUs in Greater Wellington to:</p> <p>a. address any gaps left by visions at the FMU/part of an FMU scale;</p> <p>b. give effect to Objective 12.</p> <p>[Note: submission in reference to Clause 3.3 NPS-FM]</p>	<p>Add a new overarching vision to apply to all FMUs in Greater Wellington as follows:</p> <p>"All of Greater Wellington catchment vision" By no later than 2040, in all Greater Wellington catchments:(1) Water bodies are protected, or restored to a state of good health, well-being and resilience,(2) Activities relating to water support the health, well-being and resilience of affected waterbodies,(3) The natural form and function of water bodies, including with respect to water quality, sedimentation and flows, mimics that of their natural behaviour,(4) Ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored,(5) Wetland, estuary and lagoon extent has been restored as much as practical where it has been lost, and their quality is protected and restored,(6) The habitat of indigenous freshwater species is protected and restored, and indigenous species are able to migrate easily within and between catchments, except where it is desirable to prevent the passage of some fish species in order to protect indigenous species, their life stages, or their habitats,(7) Food is available to be harvested from water bodies and is safe to consume,(8) People have abundant, quality opportunities to connect with and safely undertake</p>	Reject

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									<p>recreational activities within or close to a wide range of water bodies,(9) There are no direct discharges of wastewater to water bodies.</p> <p>Make the required consequential amendments to specific FMU visions to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where these contain more stringent protection of the health and well-being of water bodies and freshwater ecosystems than provided for in the overarching vision.</p>	
S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS2.78	Rangitāne o Wairarapa Inc	FS2.78	Rangitāne o Wairarapa Inc	General comments - fresh water	Support in part	Rangitāne support in part, the articulation of the overarching vision proposed by Forest & Bird. However this vision is incomplete, in that it does not articulate the Te Ao Maori dimension. This highlights the need for long term visions to be developed in partnership with tangata whenua.	Allow in part	Reject
S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS22.007	Director-General of Conservation / Tumuaki Ahurei	FS22.007	Director-General of Conservation / Tumuaki Ahurei	General comments - fresh water	Support	The overarching freshwater vision proposed would improve integration and effectiveness across the RPS, and would better give effect to the NPSFM.	Allow	Reject
S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.054	Beef + Lamb New Zealand Ltd	FS30.054	Beef + Lamb New Zealand Ltd	General comments - fresh water	Oppose	It is inappropriate to suggest the inclusion of a Wellington Region Vision in accordance with Clause 3.3 of the NPSFM2020 without undertaking the necessary community	Disallow	Accept

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								engagement as required by Part 3.4 of the NPS-FM.		
S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS19.032	Wellington Water Ltd ("Wellington Water")	FS19.032	Wellington Water Ltd ("Wellington Water")	General comments - fresh water	Oppose in part	The timeframe is unrealistic. Where there are existing activities that impact on these outcomes, progressive improvement should be required.	Allow in part Accept with changes	Reject
S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS28.023	Horticulture New Zealand	FS28.023	Horticulture New Zealand	General comments - fresh water	Oppose	The relief sought adds another 'layer' to the NOF framework (which required long-term visions to be set for FMU) that is not required and will create confusion as to how this fits within the RPS and broader freshwater policy framework.	Disallow	Accept
S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS15.011	DairyNZ	FS15.011	DairyNZ	General comments - fresh water	Oppose	DairyNZ does not agree that freshwater visions should be set for the region as a whole. Clause 3.3 (2) of the NPS-FM makes it clear that freshwater visions should be set at the FMU, part of the FMU or catchment levels. Clause 3.3(3) makes it clear freshwater visions should be developed through engagement with communities and tangata whenua.	Disallow	Accept
S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS3.013	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.013	Waka Kotahi NZ Transport Agency (Waka Kotahi)	General comments - fresh water	Oppose	Waka Kotahi has concerns over the proposed wording with no clarity regarding the existing environments, specific outcomes sought and likely requirements to implement this policy.	Disallow Waka Kotahi seeks that the submission point be disallowed, or alternatively if allowed Waka Kotahi would like to be involved in redrafting.	Accept
S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.063	Ātiawa ki Whakarongotai Charitable Trust	FS20.063	Ātiawa ki Whakarongotai Charitable Trust	General comments - fresh water	Oppose	While Ātiawa acknowledge the concerns raised by Forest and Bird, however, we do not support an overarching vision, it is not clear which vision would take a precedent (i.e. the FMU vision or 'overarching vision') in practice. In addition, Ātiawa support recognised mana whenua to work in partnership with regional council to identify their own vision	Disallow	Accept

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								statements as provided for by the legislation.		
S165.019	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	General comments - fresh water	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept

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S167.001	Taranaki Whānui			S167.001	Taranaki Whānui	General comments - fresh water	Not Stated / Neutral	<p>Taranaki Whānui migrated to the Wellington area in the 1820s through to 1830s. Since then, Taranaki Whānui has maintained ahi kā (permanent occupation). Taranaki Whānui established kāinga and papakāinga around the Wellington Harbour (and other areas). The traditional kāinga, papakāinga, māra kai (gardens) mahinga kai (food gathering areas) and other sites of cultural significance have now been largely subsumed by urban development. Yet, Taranaki Whānui remain. Migration has meant that Taranaki Whānui are now a minority within their tribal takiwā (tribal area).</p> <p>The takiwā of Taranaki Whānui extends from Turākirae, to Tāpokopoko, to Papatahi, to Orongorongo and onto Remutaka. From Remutaka, up to Pareraho, to Pōkaimangumangu, across to Pipinui, to Te Rimurapa and a direct line back to Turākirae.</p> <p>Taranaki Whānui has overlapping interests with Ngāti Toa Rangatira, Rangitāne o Wairarapa and Ngāti Kahungunu ki Wairarapa.</p> <p>As Ahi kā of the capital city of Aotearoa/ New Zealand, Taranaki Whānui's vision is to ensure that their members not only maintain their place within the takiwā but are thriving and prosperous. The loss of land and the fragmentation of Taranaki Whānui descendants and whānau (family group) over the decades creates significant challenges as they seek to restore the rightful</p>	Insertion of new statement of Taranaki Whānui Freshwater Vision and Te Mana o Te Wai Expression.	Accept in part

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								place of their members and descendants.		
S167.001	Taranaki Whānui	FS2.137	Rangitāne o Wairarapa Inc	FS2.137	Rangitāne o Wairarapa Inc		Support	Rangitāne o Wairarapa support the request to include Te Mana o te Wai expressions from other iwi. Implementation of the NPS FM needs to involve all areas within the regions and therefore each mana whenua Te Mana o te Wai Statement needs to be recognised and provided for, to give mana to each whakaaro.	Allow	Accept in part
S167.001	Taranaki Whānui	FS22.0010	Director-General of Conservation / Tumuaki Ahurei	FS22.0010	Director-General of Conservation / Tumuaki Ahurei		Support	The inclusion of iwi statements is appropriate under the NPSFM and supported by the D-G.	Allow	Accept in part
S167.028	Taranaki Whānui			S167.028	Taranaki Whānui	General comments - fresh water	Oppose in part	Taranaki Whānui note the primary purpose of amendments to the Freshwater Chapter as giving effect to the National Policy Statement for Freshwater Management 2020. In Septemeber 2021, Te Mahere Wai o Te Kāhui Taiao was developed in response to the National Policy Statement for Freshwater Management 2020 and is an articulation of Te Mana o Te Wai by mana whenua. In general, the proposed amendments to the Regional Policy Statement have	Ensure the proposed amendments to the Regional Policy Statement, Freshwater Chapter and other freshwater related provisions, policies and methods have overtly responded to Te Mahere Wai o Te Kāhui Taiao and have responded to key sections of the National Policy Statement for Freshwater Management 2020, including Section 3.4 Tangata whenua involvement. Taranaki Whānui wish to work in	Reject

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								<p>not overtly responded to Te Mahere Wai o Te Kāhui Taiao. Further work is required to give effect to this throughout the Freshwater Chapter and other freshwater related provisions of the Regional Policy Statement. This needs to include reviewing the policies and methods associated with the Freshwater objectives of the Regional Policy Statement.</p> <p>Similarly, it is unclear how the proposed amendments have responded to other key sections of the National Policy Statement for Freshwater Management 2020, namely Section 3.4 Tangata whenua involvement.</p> <p>Taranaki Whānui wish to work in partnership with Greater Wellington Regional Council to identify and address the above points and identify appropriate responses to this through this and future Plan Changes.</p>	partnership with Greater Wellington Regional Council to identify and address the above points and identify appropriate responses to this through this and future Plan Changes.	
S167.028	Taranaki Whānui	FS2.118	Rangitāne o Wairarapa Inc	FS2.118	Rangitāne o Wairarapa Inc	General comments - fresh water	Support in part	We support Taranaki Whānui to produce and provide information for this section to align with their values, and that the RSP should respond to Te Mahara Wai o te Kāhui Taiao. We also note that implementation of the NPS FM needs to involve all areas within the regions and therefore each mana whenua Te Mana o te Wai Statement needs to be recognised and provided for, to give mana to each whakaaro.	Allow in part	Reject
S167.028	Taranaki Whānui	FS19.039	Wellington Water Ltd ("Wellington Water")	FS19.039	Wellington Water Ltd ("Wellington Water")	General comments - fresh water	Support in part	Support concept but the relief sought provides insufficient clarity.	Allow in part Accept with changes	Reject

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S167.031	Taranaki Whānui			S167.031	Taranaki Whānui	General comments - fresh water	Not Stated / Neutral	Taranaki Whānui have provided a Freshwater Vision and Expression of Te Mana o Te Wai and is attached with this submission.	[Note. Submission point refer S167.001] Insertion a new provision Statement of Taranaki Whānui Te Mana o te Wai expression , draft provided in the original submission.	Accept
S168.005	Rangitāne O Wairarapa Inc			S168.005	Rangitāne O Wairarapa Inc	General comments - fresh water	Support	In our opinion, replicating or paraphrasing the requirements of the NPS FM, in some cases inaccurately, does not provide any further assistance to plan users looking for guidance on the interpretation of national direction at the regional level. It is also likely to generate inefficiencies in future resource management processes, as those looking to assess their proposals against the relevant freshwater management framework may not have confidence that the RPS gives full effect to the NPS FM. This will result in the need for further assessment of proposals against the NPS FM, with all the inefficiencies that brings, to avoid falling foul of case law on this matter.	Rangitāne asks that any provisions in the plan change that are simply a replication or paraphrase of provisions in the NPS FM are amended so that they appropriately give effect to those NPS FM provisions in terms that reflect the regional context.	Accept in part
S168.005	Rangitāne O Wairarapa Inc	FS30.050	Beef + Lamb New Zealand Ltd	FS30.050	Beef + Lamb New Zealand Ltd	General comments - fresh water	Support in part	B+LNZ agree that replicating or paraphrasing the requirements of the NPSFM does not provide further assistance to plan users looking for guidance on the interpretation of national direction at a regional level and that this will generate inefficiencies in future resource management processes. Rangitāne O Wairarapa Inc are seeking amendments to appropriately give effect to those NPSFM provisions in terms that reflect the regional context. B+LNZ consider that currently, the RPS does not give effect	Allow in part	Accept in part

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								to Part 3.2 of the NPSFM2020 in terms of the necessary engagement from communities who will be materially impacted by these provisions.		
S168.005	Rangitāne O Wairarapa Inc	FS28.024	Horticulture New Zealand	FS28.024	Horticulture New Zealand	General comments - fresh water	Support	HortNZ agree with the view of Rangitāne O Wairarapa Inc. that many of the freshwater provisions simply duplicate the NPSFM	Allow Allow amendment to reduce duplication of the NPSFM (subject to specifics of the amendment sought)	Accept in part
S168.005	Rangitāne O Wairarapa Inc	FS31.019	Sustainable Wairarapa inc	FS31.019	Sustainable Wairarapa inc	General comments - fresh water	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its	Not stated	Accept in part

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								<p>clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.006	Rangitāne O Wairarapa Inc			S168.006	Rangitāne O Wairarapa Inc	General comments - fresh water	Support in part	<p>Rangitāne o Wairarapa strongly object to the statement in the Section 32 report that the Whaitua regions will be identified as Freshwater Management Unit's (FMU's). The Whaitua is not sufficiently fine grained for this purpose and is a form of colonisation that will not combine the management approaches that are vital to restoring our waterways and our whānau, hapū and wider community health.</p>	Rangitāne o Wairarapa ask that the Proposed Plan change include additional provisions which clearly set out the timing and process for co-designing and incorporating FMUs into the RPS, and from there, the inclusion of mana whenua voices (as outlined in recommendation 1 of the Ruamāhanga WIP) in the freshwater visions for each FMU.	Accept in part
S168.006	Rangitāne O Wairarapa Inc	FS31.020	Sustainable Wairarapa inc	FS31.020	Sustainable Wairarapa inc	General comments - fresh water	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most</p>	Not stated	Accept in part

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								<p>members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.007	Rangitāne O Wairarapa Inc			S168.007	Rangitāne O Wairarapa Inc	General comments - fresh water	Not Stated / Neutral	The Section 32 report states that Change 1 does not fully implement the NPS FM and that Change 1 is focused on 'objectives/visions which the NPS directs to be included in the RPS'.	It is Rangitāne o Wairarapa's view that the plan change goes further than this, and proposes a number of policies which, in title at least, seek to manage land use and development as it impacts on freshwater in 'urban' environments.	No recommendation

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S168.007	Rangitāne O Wairarapa Inc	FS31.021	Sustainable Wairarapa inc	FS31.021	Sustainable Wairarapa inc	General comments - fresh water	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	No recommendation

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								Nga mihi nui Ian Gun		
S168.009	Rangitāne O Wairarapa Inc			S168.009	Rangitāne O Wairarapa Inc	General comments - fresh water	Not Stated / Neutral	<p>Policy 3 of the NPS FM directs that freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, rather than distinguishing 'urban development' from other forms of development.</p> <p>Section 3.5 of the NPS FM directs every regional council to make or change its regional policy statement to the extent needed to provide for 'the integrated management of the effects of use and development of land on freshwater and receiving environments'. Again, Section 3.5 of the NPS FM does not distinguish between the management approaches that should be applied to urban, rural or peri-urban development.</p>	We consider that, in order to give effect to the NPS FM, the proposed policies should provide for a te ao Māori view of how we enact kaitiakitanga (often referred to as 'integrated management' of freshwater) for all development in all areas. Holistic solutions are vital. Compartmentalising solutions have caused a lot of the issues we see today. We also note that the Operative RPS does not distinguish 'rural' from 'urban' development in this way.	No recommendation
S168.009	Rangitāne O Wairarapa Inc	FS30.051	Beef + Lamb New Zealand Ltd	FS30.051	Beef + Lamb New Zealand Ltd	General comments - fresh water	Not Stated / Neutral	B+LNZ support in the concept of ensuring the use and development of land is managed in an integrated manner.	Allow in part	No recommendation

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S168.009	Rangitāne O Wairarapa Inc	FS28.025	Horticulture New Zealand	FS28.025	Horticulture New Zealand	General comments - fresh water	Oppose in part	There could be unintended consequences of applying policy developed for the urban context to other development and seek that any such changes were undertaken through a separate process.	Disallow in part Disallow relief in relation to expanding the policy beyond the urban development intent for which these provisions were drafted without further review and s32 analysis.	No recommendation
S168.009	Rangitāne O Wairarapa Inc	FS31.023	Sustainable Wairarapa inc	FS31.023	Sustainable Wairarapa inc	General comments - fresh water	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further	Not stated	No recommendation

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.010	Rangitāne O Wairarapa Inc			S168.010	Rangitāne O Wairarapa Inc	General comments - fresh water	Not Stated / Neutral	We are also concerned at Wastewater management within the RPS changes	Any wastewater solutions need to give effect to te Mana o te Wai and holistically be approached as per integrated management. We hope that this issue will be addressed in future plan changes as it hasn't been addressed here (only minor reference to sludge in Policy)	No recommendation
S168.010	Rangitāne O Wairarapa Inc	FS31.024	Sustainable Wairarapa inc	FS31.024	Sustainable Wairarapa inc	General comments - fresh water	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late</p>	Not stated	No recommendation

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.011	Rangitāne O Wairarapa Inc			S168.011	Rangitāne O Wairarapa Inc	General comments - fresh water	Not Stated / Neutral	<p>Introducing a set of freshwater provisions for urban development only, continues to provide compartmentalised solutions and does not address integrated catchments.</p>	<p>[Note - Submission refers to Part 4 of Schedule 1 of the RMA - FM process]</p> <p>This highlights the need for additional provisions to be added to the RPS in co-design and collaboration with mana whenua (or for the existing provisions to be amended to apply more broadly) to manage all other types of development. However, there is no specified process or timeframe as to when these provisions will be developed and incorporated into the RPS. This will result in a high degree of</p>	No recommendation

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									unnecessary procedural repetition and potential for inconsistencies in approach, as provisions are debated through separate Schedule 1 processes. There is a high risk that dealing with only one element of development in the RPS will create policy loopholes and gaps which will frustrate efficient and effective decision-making.	
S168.011	Rangitāne O Wairarapa Inc	FS31.035	Sustainable Wairarapa inc	FS31.035	Sustainable Wairarapa inc	General comments - fresh water	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its	Not stated	No recommendation

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								<p>clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.012	Rangitāne O Wairarapa Inc			S168.012	Rangitāne O Wairarapa Inc	General comments - fresh water	Not Stated / Neutral	The further degradation of our wai is not an option, and we are concerned that the disjointed policy approach facilitates the continued of degradation of our wai. This will also lead to confusion, over complication and non-compliance. Simple clear policy direction and non segregation is key to informing and educating our community and people to look after the health of our wai.	Rangitāne o Wairarapa Inc. therefore requests that the Plan Change be amended to include a set of high level but coherent, concise freshwater provisions that applies to all development.	Reject
S168.012	Rangitāne O Wairarapa Inc	FS28.026	Horticulture New Zealand	FS28.026	Horticulture New Zealand	General comments - fresh water	Oppose in part	There could be unintended consequences of applying policy developed for the urban context to rural development and seek that any such changes were undertaken through a separate process.	Disallow in part Disallow relief in relation to expanding urban development to a rural context as part of PC1	Accept in part

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S168.012	Rangitāne O Wairarapa Inc	FS31.046	Sustainable Wairarapa inc	FS31.046	Sustainable Wairarapa inc	General comments - fresh water	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Reject

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								Nga mihi nui Ian Gun		
S169.002	Kahungunu Ki Wairarapa			S169.002	Kahungunu Ki Wairarapa	General comments - fresh water	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified	Accept in part
S169.002	Kahungunu Ki Wairarapa	FS30.047	Beef + Lamb New Zealand Ltd	FS30.047	Beef + Lamb New Zealand Ltd	General comments - fresh water	Support in part	In principle, B+LNZ support the inclusion of iwi expressions of Te Mana o Te Wai in PC1, however B+LNZ agree with Wellington Fish and Game that the concept of Te Mana o Te Wai forms the fundamental underpinning of the NPS-FM and that currently as drafted Objective 12 falls short of what is required under the NPSFM, particularly in regard to the engagement with communities to	Allow in part	Accept in part

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								determine what the application of Te Mana o te Wai means in the GWR. We consider this an important step for the successful implementation of Te Mana o Te Wai.		
S169.002	Kahungunu Ki Wairarapa	FS31.003	Sustainable Wairarapa inc	FS31.003	Sustainable Wairarapa inc	General comments - fresh water	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of	Not stated	Accept in part

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								options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui Ian Gun		
S170.001	Te Rūnanga o Toa Rangatira			S170.001	Te Rūnanga o Toa Rangatira	General comments - fresh water	Not Stated / Neutral	We (the submitters) also have provided our 'Statement of Ngāti Toa Rangatira - Freshwater Vision' as part of this submission.	Insert a new ' Statement of Ngāti Toa Rangatira - Freshwater Vision '. [Note. Please refer to the original submission for details of a draft of Statement of Ngāti Toa Rangatira - Freshwater Vision]	Reject
S170.001	Te Rūnanga o Toa Rangatira	FS22.011	Director-General of Conservation / Tumuaki Ahurei	FS22.011	Director-General of Conservation / Tumuaki Ahurei	General comments - fresh water	Support	The inclusion of iwi statements is appropriate under the NPSFM and supported by the D-G	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S170.001	Te Rūnanga o Toa Rangatira	FS29.001	Ngā Hapu o Otaki	FS29.001	Ngā Hapu o Otaki	General comments - fresh water	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.		
S11.006	Outdoor Bliss Heather Blissett			S11.006	Outdoor Bliss Heather Blissett	Freshwater introductory text	Support in part	Correction to page 30. In Upper Hutt a main Highway divides a people from the river creating a disconnect. One idea. Lift the road so that people can access the river freely and accessibly.	Change the wording from "Flood management" to "Environmental protection".	Reject
S102.040	Te Tumu Paeroa Office of the Māori Trustee			S102.040	Te Tumu Paeroa Office of the Māori Trustee	Freshwater introductory text	Support	Generally supports the 'Chapter Introductions' for Freshwater (including public access).	Retain as notified.	Accept in part

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S131.028	Ātiawa ki Whakarongotai Charitable Trust			S131.028	Ātiawa ki Whakarongotai Charitable Trust	Freshwater introductory text	Support in part	<p>Ātiawa supports in part the overall intent of the Chapter Introduction given it provides updated reference to the NPS-FM and Te Mana o te Wai. However, Ātiawa seeks further changes to the introduction to further align wording with current legislation and to reflect best practice and approaches to freshwater management in the region. In general, the chapter introduction is outdated and the changes made are only inserting reference to the NPS-FM and Te Mana o te Wai. It is concerning that in the almost ten years since the policy statement was made operative (24 April 2013) there have been no amendments made to the context and freshwater issues in the region. Although Ātiawa acknowledges many of these issues are enduring and remain the same, some of the wording does not reflect a 2022 view of freshwater management.</p> <p>Noting that a local authority must commence a review of a provision if the provision has not been subject to review during the previous 10 years (s79, RMA). Ātiawa seeks clarity on the timing on the outstanding provisions that have not been reviewed through RPS Change 1. Ātiawa note that plan change processes are a significant draw on iwi resources and capacity. Where there is sufficient time it makes sense to review these freshwater provisions in a holistic manner, rather than a piece meal approach.</p>	Mana whenua and Regional Council work together to redraft the chapter introduction, this could be addressed as part of the plan change process to give full effect to NPS-FM by 31 December 2024.	No recommendation

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S131.028	Ātiawa ki Whakarongotai Charitable Trust	FS29.299	Ngā Hapu o Otaki	FS29.299	Ngā Hapu o Otaki	Freshwater introductory text	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	No recommendation

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S137.001	Greater Wellington Regional Council (GWRC)			S137.001	Greater Wellington Regional Council (GWRC)	Freshwater introductory text	Support in part	Freshwater visions in the regional policy statement will drive freshwater provisions in the Natural Resources Plan at the whitua scale. A map of whitua boundaries is therefore necessary to support the freshwater visions for each whitua.	Insert a map of whitua boundaries, exactly as shown in Attachment 2 of this submission (<i>Map of whitua boundaries to be inserted in freshwater chapter introduction</i>), into the introductory text for Chapter 3.4, with the following caption: Figure 2A: Map of whitua boundaries.	Reject
S137.001	Greater Wellington Regional Council (GWRC)	FS2.122	Rangitāne o Wairarapa Inc	FS2.122	Rangitāne o Wairarapa Inc	Freshwater introductory text	Support in part	Whilst Rangitāne o Wairarapa support this additional information we are concerned that the boundaries of the whitua are too large, especially in the Wairarapa and that further work with Mana Whenua is needed to determine how these areas are taken forward.	Allow in part	Reject

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S145.001	Wairarapa Water Users Society			S145.001	Wairarapa Water Users Society	Freshwater introductory text	Oppose in part	<p>There is no time-critical imperative to review the Freshwater provision of the RPS. The only urgent requirement is the Urban Development provisions.</p> <p>The additions to the chapter introduction are symptomatic of the unnecessary haste being applied to the Plan change.</p> <p>The fact that only 2 out of 6 iwi have managed to provide an Expression of their meaning of Te Mana o Te Wai makes the plan review less than inclusive.</p> <p>The introduction should also recognise the significant community input into the Ruamahanga Whaitua and the Wairarapa Water Resilience Strategy.</p> <p>Both of these documents have been accepted by GWRC.</p>	<p>Removal of the Freshwater Chapter from this review.</p> <p>OR</p> <p>If the chapter is retained, the Introduction should recognise the Ruamahanga Whaitua Implementation Plan AND the Wairarapa Water Resilience Strategy</p>	Accept in part
S145.001	Wairarapa Water Users Society	FS2.117	Rangitāne o Wairarapa Inc	FS2.117	Rangitāne o Wairarapa Inc	Freshwater introductory text	Oppose	<p>The NPS-FM has been in place since August 2020 and implementation should already be well under way. Our water is a taonga and needs to be protected as soon as possible from further detrimental impacts. It is vital that this work is undertaken immediately and these provisions strengthen good practices to ensure our water is safeguarded for future generations.</p>	Disallow	Accept in part
S145.001	Wairarapa Water Users Society	FS28.027	Horticulture New Zealand	FS28.027	Horticulture New Zealand	Freshwater introductory text	Support in part	<p>HortNZ support a decision to defer review of freshwater provisions until 2024, or to the extent provisions are retained recognition of the work undertake to date as referred to in the submission.</p>	Allow in part	Accept in part

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S163.023	Wairarapa Federated Farmers			S163.023	Wairarapa Federated Farmers	Freshwater introductory text	Oppose	Amendments to this text should be considered as part of planned 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). See submission for more detail.	Delete the proposed amendments to the introduction.	Reject
S163.023	Wairarapa Federated Farmers	FS2.114	Rangitāne o Wairarapa Inc	FS2.114	Rangitāne o Wairarapa Inc	Freshwater introductory text	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept for mana whenua and although some iwi have contributed to the articulation of Te Mana o te Wai in the proposed changes to the RPS, others have chosen to define this through their Whitua process, as they see fit. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow	Accept
S163.023	Wairarapa Federated Farmers	FS15.012	DairyNZ	FS15.012	DairyNZ	Freshwater introductory text	Support	DairyNZ agrees with the submitters concerns and the relief sought	Allow	Reject
S163.023	Wairarapa Federated Farmers	FS7.067	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.067	Royal Forest and Bird Protection Society (Forest & Bird)	Freshwater introductory text	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the	Disallow Disallow whole submission	Accept

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								RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.		
S163.023	Wairarapa Federated Farmers	FS20.189	Ātiawa ki Whakarongotai Charitable Trust	FS20.189	Ātiawa ki Whakarongotai Charitable Trust	Freshwater introductory text	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept
S163.023	Wairarapa Federated Farmers	FS29.040	Ngā Hapu o Otaki	FS29.040	Ngā Hapu o Otaki	Freshwater introductory text	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented. Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy'	Not stated	Accept

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								aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.		
S163.023	Wairarapa Federated Farmers	FS30.096	Beef + Lamb New Zealand Ltd	FS30.096	Beef + Lamb New Zealand Ltd	Freshwater introductory text	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Reject
S165.013	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.013	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Freshwater introductory text	Support in part	This provides a fairly accurate general overview. However, concerned that the margins of rivers, lakes and wetlands often fall through the cracks. These areas must also be recognised per section 6(a) of the RMA.	Amend the first paragraph as follows: Fresh water is integral to our health, wellbeing, livelihood and culture. Freshwater is essential for our economy and defines our landscape and sustains ecosystems. People value clean fresh water for many reasons - economic, recreational, aesthetic, ecological and cultural. It is a matter of national importance to protect wetlands, lakes, rivers, streams and their margins from inappropriate use and development.	Accept
S165.013	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS2.127	Rangitāne o Wairarapa Inc	FS2.127	Rangitāne o Wairarapa Inc	Freshwater introductory text	Support	Rangitāne o Wairarapa support the submitters request to insert 'margins'. This insertion properly reflects the text of the RMA.	Allow	Accept

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S165.013	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.058	Ātiawa ki Whakarongotai Charitable Trust	FS20.058	Ātiawa ki Whakarongotai Charitable Trust	Freshwater introductory text	Support	Ātiawa support the amendment sought by Forest and Bird, it is a much more integrated approach to include the margins of freshwater environments. The relief sought is in-line with the RMA.	Allow	Accept
S165.013	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Freshwater introductory text	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject
S166.011	Masterton District Council			S166.011	Masterton District Council	Freshwater introductory text	Support in part	Rathkeale College does not discharge anymore.	Amend the paragraph to read: There are eight seven major discharges of treated sewage to fresh water in the region - one from the treatment plant at Paraparaumu, one from Rathkeale College in Masterton, with the rest from the Wairarapa	Accept

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									towns of Masterton, Castlepoint, Carterton, Greytown, Featherston and Martinborough.	
S167.029	Taranaki Whānui			S167.029	Taranaki Whānui	Freshwater introductory text	Oppose in part	The proposed wording does not reflect the intention of Taranaki Whānui to include a Freshwater Vision and Expression of Te Mana o Te Wai through this submission process and requires subsequent amendments. Further, the issues of significance for iwi have not been revised and do not respond to the issues outlined in Te Mahere Wai o Te Kāhui Taiao, which should be adopted as the issues of significance for Taranaki Whānui.	Include Taranaki Whānui's Freshwater Vision and Expression of Te Mana o Te Wai and revise the issues of significance for iwi outlined in Te Mahere Wai o Te Kāhui Taiao.	Accept in part
S167.029	Taranaki Whānui	FS2.119	Rangitāne o Wairarapa Inc	FS2.119	Rangitāne o Wairarapa Inc	Freshwater introductory text	Support in part	We welcome Taranaki Whānui to produce and introduce information into this section to align with their values. We also note that each mana whenua Te Mana o te Wai Statement needs to be recognised and provided for, to give mana to each whakaaro.	Allow in part	Accept in part
S168.031	Rangitāne O Wairarapa Inc			S168.031	Rangitāne O Wairarapa Inc	Freshwater introductory text	Support in part	The current text in paragraph 2 doesn't put the health and wellbeing of water bodies and freshwater ecosystems first and foremost. The language used reflects competing values i.e. "multiple resource users with differing values". Statements such as: "Māori consider fresh water to be a significant taonga (valued resource) that plays a central role in both spiritual and secular realms" implies that Māori tikanga and mātauranga is a religious endeavour. What we do is not religious, this is cultural practice from multiple generations of observing, learning and listening to our taiao.	Amend the introductory text to clarify the hierarchy of obligations in Objective 2.1 of the NPS FM and to remove implications that Māori are acting within a religious realm. Add lack of integrated management of freshwater ecosystems to the list of regionally significant issues.	Accept in part

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								Rangitāne o Wairarapa supports the inclusion of text explaining the expressions of Te Mana o te Wai. However, having now seen the structure of the provision, we have some concerns about how our Te Mana o te Wai statement's will be implemented and incorporated into Objective 12, as explained below.		
S168.031	Rangitāne O Wairarapa Inc	FS31.141	Sustainable Wairarapa inc	FS31.141	Sustainable Wairarapa inc	Freshwater introductory text	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor	Not stated	Accept in part

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								<p>understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S16.046	Kāpiti Coast District Council			S16.046	Kāpiti Coast District Council	Objective 12	Support	<p>Council considers the objective appropriately gives effect to the requirements of the NPS-FM with respect to the expression of Te Mana o te Wai.</p> <p>Council looks forward to seeing the yet to be drafted expressions of Te Mana o te Wai from those iwi who hold mana whenua within the Kāpiti Coast District.</p> <p>Council notes and supports clause (d) of the Te Mana o te Wai principles that makes it clear under the principle of Governance that it requires those with authority for making decisions about freshwater do so in a way that prioritises the health and well-being of freshwater now and into the future.</p>	Retain	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.012	Porirua City Council			S30.012	Porirua City Council	Objective 12	Oppose	<p>This objective repeats the NPS-FM and adds no value to the RPS, the objective should articulate what outcomes are sought for the Wellington Region.</p> <p>It is not necessary or consistent with best practice plan making to repeat what is in higher order documents (including the RMA itself). An RPS should provide regional context for national direction. Further, the objective is too long and unwieldy.</p> <p>While Council is not directly impacted by the two mana whenua statements, Council is concerned to ensure that any new statements that are inserted into the RPS by way of submission or subsequent variation are able to be achieved and implemented. It is unclear what the intent is with the mana whenua statements and what is the intended legal status of them vis a vis the body of the objective itself. Are they intended to be objectives in their own right? There needs to be more clarity provided. The statements contain many objectives and policies within them, which would need to be examined in terms of being measurable, achievable, realistic and relevant, and within scope of the RMA. It is unclear what the status of the policies in the mana whenua statements is in respect to being referred to as being objectives. If they are intended to be objectives in their own right, then they need more work done on them to fit within the RPS; rather than read as a tack-on as they do now. The current framing that the GWRC has provided for the objective is likely to result in considerable</p>	<p><i>[Note: Amendment references Statement of Rangitāne o Wairarapa Te Mana o te Wai expression and Kahungunu ki Wairarapa Te Mana o te Wai expression, after Table 4, Chapter 3.4]</i></p> <p>Amend the objective so that it is clear what the outcomes sought are. These amendments should provide clarity as to the status and purpose of the iwi statements, including their weighting and status compared to the other FW objectives and how any conflicts should be managed.</p> <p>Ensure that any new statements that are inserted into the RPS by way of submission or subsequent variation are able to be achieved and implemented as above.</p>	Accept in part

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								<p>confusion in trying to give effect to them.</p> <p>It is recommended that the GWRC promulgate a variation that provides more clarity and certainty as to what Objective 1 of the NPS-FM means within the Wellington Region and reconsiders the framing of the mana whenua objectives in this regard.</p>		
S30.012	Porirua City Council	FS2.130	Rangitāne o Wairarapa Inc	FS2.130	Rangitāne o Wairarapa Inc	Objective 12	Support in part	Rangitāne agree with the submitter that further work is needed to imbed the Te Mana o te Wai statements into the RPS. Rangitāne has sought (via its original submission) to work in partnership with GWRC to determine how best to do this in a way that gives effect to the NPS FM.	Allow in part	Accept in part
S30.012	Porirua City Council	FS11.002	Fulton Hogan Limited	FS11.002	Fulton Hogan Limited	Objective 12	Support	Objective 12 repeats the NPS-FM Te Mana o te Wai hierarchy. The pRPS needs to give effect to the NPS-FM but should provide a regional context to the priorities. It is unclear how the iwi statements, which form part of Objective 12, are to be applied when implementing the RPS. The statements cover a wide range of matters, include their own objectives and policies that sit within Objective 12, and include some matters that are outside the scope of the RMA. This will create significant confusion and complexity when implementing the RPS. The statements need to be refined if they are to be included and greater clarity is required on their implementation.	Allow	Accept in part

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S30.012	Porirua City Council	FS28.028	Horticulture New Zealand	FS28.028	Horticulture New Zealand	Objective 12	Support in part	HortNZ support amendments to amendments should provide clarity as to the status and purpose of the iwi statements,	Allow in part	Accept in part
S30.012	Porirua City Council	FS25.037	Peka Peka Farm Limited	FS25.037	Peka Peka Farm Limited	Objective 12	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part
S34.054	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.054	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Objective 12	Oppose in part	Council supports the objective in principle. However, is considered unnecessary to repeat the provisions of the NPS-FM. It is also noted that the provisions included are inaccurate, and inconsistent with the wording of the NPS- FM. Clause c) may be an issue for parts of the communities, especially for those reliant on/the users of irrigation and bore water.	Amend (c) to reflect the NPS- FM accurately.	Reject
S34.054	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	FS2.134	Rangitāne o Wairarapa Inc	FS2.134	Rangitāne o Wairarapa Inc	Objective 12	Support in part	Rangitāne o Wairarapa support this and consider there are some areas where section 3.4 does not accurately reflect the NPS-FM or the RMA and could be strengthened.	Allow in part	Reject
S79.008	South Wairarapa District Council			S79.008	South Wairarapa District Council	Objective 12	Support in part	The prioritisation of the health needs of people are supported. More work needs to be done to improve efficiency of use when GWRC makes decisions allocating takes of water. Any changes in allocation requirements for municipal supplies should be phased in over the length of the approval.	Retain as notified.	Reject
S86.001	Irrigation New Zealand (IrrigationNZ)			S86.001	Irrigation New Zealand (IrrigationNZ)	Objective 12	Support in part	Broadly supports the hierarchy of obligations expressed in Objective 12. Notes that the hierarchy fails to	Amend to better reflect the needs of primary industries in the Greater Wellington Region.	Reject

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								regard the importance of irrigation systems and its symbiotic relationship with the health needs of the people and the submission provides further details on the importance of irrigation.		
S86.001	Irrigation New Zealand (IrrigationNZ)	FS2.112	Rangitāne o Wairarapa Inc	FS2.112	Rangitāne o Wairarapa Inc	Objective 12	Oppose in part	Irrigation does not support the health of our water, which is the first and foremost priority for Te Mana o te Wai. The careful consideration of true ecologically supportive primary industries is important.	Disallow in part	Accept
S86.001	Irrigation New Zealand (IrrigationNZ)	FS19.018	Wellington Water Ltd ("Wellington Water")	FS19.018	Wellington Water Ltd ("Wellington Water")	Objective 12	Oppose	Water for community supplies should take precedence.	Disallow	Accept
S86.001	Irrigation New Zealand (IrrigationNZ)	FS28.029	Horticulture New Zealand	FS28.029	Horticulture New Zealand	Objective 12	Support	HortNZ support a regional articulation of Te Mana o Te Wai that recognises the importance of water for growing healthy food for the health of people.	Allow	Reject
S86.001	Irrigation New Zealand (IrrigationNZ)	FS20.027	Ātiawa ki Whakarongotai Charitable Trust	FS20.027	Ātiawa ki Whakarongotai Charitable Trust	Objective 12	Oppose	Ātiawa do not support the relief sought by the submitter, it is not appropriate for regional council to amend national policy. In order to implement and achieve Te Mana o te Wai including the hierarchy of obligations it must be applied as intended and instructed by the NPS-FM.	Disallow	Accept
S86.001	Irrigation New Zealand (IrrigationNZ)	FS9.013	Wairarapa Water Users Society	FS9.013	Wairarapa Water Users Society	Objective 12	Support	The importance of primary industries to serve the needs of the human population must be recognised	Not stated Amend to better reflect the needs of primary industries in the Greater Wellington Region.	Reject
S89.007	VicLabour			S89.007	VicLabour	Objective 12	Support	Support the structure of the three priorities in Objective 12 (Table 4), especially considering that the health and well-being of water bodies and freshwater ecosystems should always be our first priority. Without healthy	Retain as notified.	Reject

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								waterways, we do not have healthy water, and therefore we do not have healthy people.		
S102.041	Te Tumu Paeroa Office of the Māori Trustee			S102.041	Te Tumu Paeroa Office of the Māori Trustee	Objective 12	Support in part	Generally supports the objectives in the 'Freshwater' chapter. However, the statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa should be recognised and provided for to ensure their expression of Te Mana o te Wai is considered appropriately when implementing the Proposed Policy Statement.	Amend Objective 12 as follows: ... And tThe Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa are recognised and provided for.	Accept in part
S102.041	Te Tumu Paeroa Office of the Māori Trustee	FS2.100	Rangitāne o Wairarapa Inc	FS2.100	Rangitāne o Wairarapa Inc	Objective 12	Support in part	Rangitāne support the amendment to Objective 12 proposed by Te Tumu Paeroa that the statements of Te mana o te wai by Rangitāne o Wairarapa and Kahungunu ki Wairarapa are recognised and provided for. However further discussion needs to occur with tangata whenua to determine how best to incorporate these statements into the RPS framework.	Allow in part	Accept in part
S113.005	Wellington Water			S113.005	Wellington Water	Objective 12	Support in part	WWL supports Rangitāne o Wairarapa and Kahungunu ki Wairarapa expressing how effect will be given to Te Mana o te Wai in their respective rohe; but does not support the proposal to include the entirety of their statements of expression within Objective 12. While parts of the statements resemble material suitable for objectives (both in content and in length), it is not clear how objectives within statements within objective 12 should be applied relative to objective 12 itself or other objectives elsewhere in the RPS. Further, the greater part of the statements contain material that is not suitable for objectives	If it is necessary to keep the iwi statements intact, then they should not sit within Objective 12. They should be housed elsewhere within the RPS in a manner that makes clear how their variety of content types (objectives, policies, statements of issues and so on) are to be applied relative to other parts of the RPS. OR, If the statements do not need to be kept intact, then the objective-type material could be retained within objective 12, and material of other types relocated like-with-like elsewhere within the RPS (i.e.	Accept in part

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								(either in content or in length), which more closely resembles other types of RPS content. This includes expressions of visions, issues, values, expectations, principles and so on. This far exceeds the requirements of 3.2(3) of the NPS-FM. It is not clear in the proposed drafting what the role is of policies that sit within statements that sit within an objective? How will applicants draft applications with confidence that they are giving effect to the RPS?	placing policies with policies, explanations with explanations, issues with issues and so on).	
S113.005	Wellington Water	FS2.132	Rangitāne o Wairarapa Inc	FS2.132	Rangitāne o Wairarapa Inc	Objective 12	Support in part	Rangitāne agree with the submitter that further work is needed to imbed the Te Mana o te Wai statements into the RPS. Rangitāne has sought (via its original submission) to work in partnership with GWRC to determine how best to do this in a way that gives effect to the NPS FM.	Allow in part	Accept in part
S113.005	Wellington Water	FS6.006	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	FS6.006	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Objective 12	Oppose	We oppose this submission because we consider it appropriate that the mana whenua statements are kept in the freshwater chapter as they are specifically in relation to Te Mana o te Wai. We oppose this submission also because 'elsewhere' is not appropriate and that the statements are clear as to RPS intention.	Disallow	Reject
S113.005	Wellington Water	FS28.030	Horticulture New Zealand	FS28.030	Horticulture New Zealand	Objective 12	Support	HortNZ support amendment to make it clearer for plan users how the iwi statements are given effect in the document	Allow Allow amendment to provide clarity as to how the Te Mana o Te Wai statements operate as part of the RPS	Accept in part
S115.013	Hutt City Council			S115.013	Hutt City Council	Objective 12	Support in part	We support the objective, but it simply restates the objectives and principles from section 1.3 of the	Amend Objective 12 to give effect to the NPS-FW in the regional	Accept

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								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.	context, rather than repeating the higher order direction.	
S115.013	Hutt City Council	FS2.123	Rangitāne o Wairarapa Inc	FS2.123	Rangitāne o Wairarapa Inc	Objective 12	Support in part	Rangitāne o Wairarapa agree that providing a regional context to interpretation of the NPS FM is important.	Allow in part	Accept in part
S115.013	Hutt City Council	FS10.009	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	FS10.009	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	Objective 12	Support	Support the intent of the submission to amend Objective 12 to give effect to the NPS-FW in the regional context, rather than simply repeating the higher order direction, subject to review of any amended wording.	Allow Allow the submission and amend Objective 12 as sought. The Fuel Companies seek to be involved in the development of any amendments.	Accept in part
S115.013	Hutt City Council	FS19.016	Wellington Water Ltd ("Wellington Water")	FS19.016	Wellington Water Ltd ("Wellington Water")	Objective 12	Support	Regional context would be helpful.	Allow	Accept
S115.013	Hutt City Council	FS24.006	Powerco Limited	FS24.006	Powerco Limited	Objective 12	Support	Support the intent of the submission to amend Objective 12 to give effect to the NPS-FW in the regional context, rather than simply repeating the higher order direction, subject to review of any amended wording.	Allow Allow the submission and amend Objective 12 as sought. Powerco seeks to be involved in the development of any amendments.	Accept in part
S131.029	Ātiawa ki Whakarongotai Charitable Trust			S131.029	Ātiawa ki Whakarongotai Charitable Trust	Objective 12	Support	Ātiawa are supportive of Objective 12, Ātiawa are pleased the hierarchy of obligations has been included as an objective. This explicitly sets out how freshwater is to be managed in the region and is consistent with national policy direction (NPS-FM). Ātiawa also supports the inclusion of the six principles (from the NPS-FM) relating to the roles of tangata whenua and other New Zealanders in the	Ātiawa seek that Regional Council prepare a plan change (using the Freshwater Plan Change Process) to insert Ātiawa ki Whakarongotai statements at the appropriate time.	No recommendation

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								<p>management of freshwater (including the RPS and its implementation). It is important that these are included as an objective as this provides an expectation that freshwater must be managed in a way that is accordance with these principles.</p> <p>Ātiawa look forward to including statements from Ātiawa ki Whakarongotai at an appropriate time.</p>		
S131.029	Ātiawa ki Whakarongotai Charitable Trust	FS29.300	Ngā Hapu o Otaki	FS29.300	Ngā Hapu o Otaki	Objective 12	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public</p>	Not stated	No recommendation

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								<p>Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S133.005	Muaūpoko Tribal Authority			S133.005	Muaūpoko Tribal Authority	Objective 12	Oppose in part	<p>While the intent of the objective is supported, as currently drafted, it does not adequately incorporate mana/tangata whenua expressions of Te Mana o te Wai.</p> <p>Would like the opportunity to provide an expression of Te Mana o te Wai - this may be added to other iwi expressions.</p> <p>Do not consider it necessary to repeat</p>	<p>Amend the objective and incorporate local expressions into other parts of the plan to better express the elements of Te Mana o te Wai.</p> <p>AND</p> <p>Remove simple repetition of the NPSFM 2020, including the six principles.</p>	Accept in part

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								principles in the RPS. The objective should be a local expression of Te Mana o te Wai, not repeat the NPS. The objective should also be clear that Muaūpoko has a connection to the area, alongside other iwi in the region.		
S133.005	Muaūpoko Tribal Authority	FS2.126	Rangitāne o Wairarapa Inc	FS2.126	Rangitāne o Wairarapa Inc	Objective 12	Support	We agree with Muaūpoko that further work is needed to articulate and provide for the respective Te Mana o te Wai Statements of mana whenua in the RPS in a way that gives effect to the NPS FM, working in partnership with GWRC to determine how best to do this. We also agree that it is unnecessary to repeat the NPS FM.	Allow	Accept in part
S133.005	Muaūpoko Tribal Authority	FS20.352	Ātiawa ki Whakarongotai Charitable Trust	FS20.352	Ātiawa ki Whakarongotai Charitable Trust	Objective 12	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be	Disallow Disallow the whole submission	Accept in part

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								<p>incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.</p>		
S136.004	DairyNZ			S136.004	DairyNZ	Objective 12	Oppose	<p>A more effective and efficient process would be to delay changes, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these</p>	Delete changes and address issues through a full review of the RPS	Reject

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								processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3).		
S136.004	DairyNZ	FS2.110	Rangitāne o Wairarapa Inc	FS2.110	Rangitāne o Wairarapa Inc	Objective 12	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow	Accept
S136.004	DairyNZ	FS30.0010	Beef + Lamb New Zealand Ltd	FS30.0010	Beef + Lamb New Zealand Ltd	Objective 12	Support	B+LNZ agree it is inefficient to widen the scope of matters outside those required to give effect to the NPS-UD until such time as the necessary engagement has been completed and there is certainty with important national legislation for the NPS-IB and climate change.	Allow	Reject
S136.004	DairyNZ	FS19.008	Wellington Water Ltd ("Wellington Water")	FS19.008	Wellington Water Ltd ("Wellington Water")	Objective 12	Oppose	Useful to have early indications about how to achieve Te Mana o te Wai in the RPS.	Disallow	Accept
S140.016	Wellington City Council (WCC)			S140.016	Wellington City Council (WCC)	Objective 12	Support	Support as proposed.	Retain as notified.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.007	Wellington Fish and Game Council			S147.007	Wellington Fish and Game Council	Objective 12	Support in part	<p>Strongly supports all six principles of Te Mana o te Wai and their inclusion in the RPS.</p> <p>Strongly supports the prioritisation of interests and outcomes as set out in accordance with the objective in Part 2.1 of the NPS-FM.</p> <p>The concept of Te Mana o te Wai forms the fundamental underpinning of the NPS-FM. In accordance with Part 3.2(1) of the NPS-FM, GWRC must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region. Concerned that, as drafted, Objective 12 falls short of what is required under the NPS-FM. It fails to articulate a clear objective as to what the application of Te Mana o te Wai means in the GWR and to give the overarching guidance expected from an RPS.</p> <p>Support the statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa. Those Statements, along with the view of the community and other stakeholders, are vital to a proper understanding and implementation of Te Mana o te Wai. However, the statement on p. 31 that these Statements "form part of [Objective 12]" creates significant potential for confusion between the Objectives and Policies outlined in the iwi Statements and those contained in the RPS itself. This is particularly the case as elements of the iwi Statements go beyond the scope of GWRC's functions.</p>	Replace Objective 12 with a single, integrated, and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the Greater Wellington Region.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Recommends significant reconsideration of the current approach to Objective 12 with a view to the development of a single, integrated, and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the GWR.		
S147.007	Wellington Fish and Game Council	FS30.059	Beef + Lamb New Zealand Ltd	FS30.059	Beef + Lamb New Zealand Ltd	Objective 12	Support in part	B+LNZ agree that the concept of Te Mana o te Wai forms the fundamental underpinning of the NPS-FM and that currently as drafted Objective 12 falls short of what is required under the NPSFM, particularly in regard to the engagement with communities to determine what the application of Te Mana o te Wai means in the GWR.	Allow in part	Accept in Part
S147.007	Wellington Fish and Game Council	FS20.109	Ātiawa ki Whakarongotai Charitable Trust	FS20.109	Ātiawa ki Whakarongotai Charitable Trust	Objective 12	Support in part	Ātiawa also support the inclusion of the six principles of Te Mana o te Wai and their inclusion in RPS Change 1. At this time, Ātiawa do not support a single, integrated and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in Greater Wellington region.	Disallow	Reject
S147.007	Wellington Fish and Game Council	FS19.071	Wellington Water Ltd ("Wellington Water")	FS19.071	Wellington Water Ltd ("Wellington Water")	Objective 12	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS. Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>		
S163.025	Wairarapa Federated Farmers			S163.025	Wairarapa Federated Farmers	Objective 12	Oppose	Defer to the upcoming plan changes in 2023 for urban whitua, and 2024 for rural whitua. See submission for more details.	Delete the amendments to Objective 12.	Reject
S163.025	Wairarapa Federated Farmers	FS2.32	Rangitāne o Wairarapa Inc	FS2.32	Rangitāne o Wairarapa Inc	Objective 12	Oppose	Rangitāne believe the amending of the RPS is urgent and should not be postponed as proposed. It is not appropriate to amend the RPS to reflect the NPS-UD in isolation because of the interconnectedness of social, cultural, environmental, and economic aspects. Indigenous biodiversity is relevant. The process should reflect an integrated resource management approach consistent with Te Ao Māori and mātauranga Māori. Rangitāne support the inclusion of issues, objectives, policies and methods that address relevant issues relating to indigenous biodiversity, where these are guided by Te Ao Māori, as identified in overarching resource management Objective A.	Disallow	Accept
S163.025	Wairarapa Federated Farmers	FS2.116	Rangitāne o Wairarapa Inc	FS2.116	Rangitāne o Wairarapa Inc	Objective 12	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and	Disallow	Accept

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								the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.		
S163.025	Wairarapa Federated Farmers	FS7.069	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.069	Royal Forest and Bird Protection Society (Forest & Bird)	Objective 12	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept in part
S163.025	Wairarapa Federated Farmers	FS20.191	Ātiawa ki Whakarongotai Charitable Trust	FS20.191	Ātiawa ki Whakarongotai Charitable Trust	Objective 12	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S163.025	Wairarapa Federated Farmers	FS29.042	Ngā Hapu o Otaki	FS29.042	Ngā Hapu o Otaki	Objective 12	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>		No recommendation
S163.025	Wairarapa Federated Farmers	FS30.098	Beef + Lamb New Zealand Ltd	FS30.098	Beef + Lamb New Zealand Ltd	Objective 12	Support	<p>B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.</p>	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S165.015	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.015	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Objective 12	Support	Captures the concepts set out in the NPSFM	Retain.	Reject
S165.015	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.059	Ātiawa ki Whakarongotai Charitable Trust	FS20.059	Ātiawa ki Whakarongotai Charitable Trust	Objective 12	Support	Ātiawa support the recognised mana whenua of the Wellington region expressing Te Mana o te Wai relevant to their rohe.	Allow	Reject
S165.015	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Objective 12	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept
S167.030	Taranaki Whānui			S167.030	Taranaki Whānui	Objective 12	Support in part	Taranaki Whānui support the inclusion of Objective 12 as required by National Policy Statement for Freshwater Management 2020, with the following wording amendments to reflect the inclusion of a Taranaki	Amend the objective to include Taranaki Whānui, to read: "And the Statements of Taranaki Whānui , Kahungunu ki	Reject

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								Whānui Freshwater Vision and Expression of Te Mana o Te Wai;	Wairarapa, and Rangitāne o Wairarapa"	
S168.003	Rangitāne O Wairarapa Inc			S168.003	Rangitāne O Wairarapa Inc	Objective 12	Support in part	While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't (i.e when developing, whose statement should be followed and who to engage for further details). As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which, for practical purposes, may be more effective if they were sitting in other parts of the RPS, such as in the policies or methods sections	We ask that the Council, working with Rangitāne o Wairarapa Inc, amend the RPS to ensure that elements currently included in Objective 12 are fit for purpose, are appropriately located within the RPS, and can be readily interpreted and applied, in order to give effect to the National Policy Statement for Freshwater Management 2020 (NPS FM).	Accept
S168.003	Rangitāne O Wairarapa Inc	FS31.017	Sustainable Wairarapa inc	FS31.017	Sustainable Wairarapa inc	Objective 12	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period	Not stated	Accept

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								<p>to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.004	Rangitāne O Wairarapa Inc			S168.004	Rangitāne O Wairarapa Inc	Objective 12	Not Stated / Neutral	[Decision requested] is consistent with the principles of mana whakahaere and kaitiakitanga in the NPS FM and is required in order to give effect to Te Mana o te Wai. It is also provided for through mechanisms such as s33 of the RMA.	We seek that Objective 12 is amended to provide for tangata whenua / mana whenua to be actively involved by taking a lead role in making and implementing decisions about freshwater.	Accept

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S168.004	Rangitāne O Wairarapa Inc	FS31.018	Sustainable Wairarapa inc	FS31.018	Sustainable Wairarapa inc	Objective 12	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept

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								Nga mihi nui Ian Gun		
S168.032	Rangitāne O Wairarapa Inc			S168.032	Rangitāne O Wairarapa Inc	Objective 12	Support in part	The objective as currently drafted repeats what is in the NPS FM but doesn't provide any further guidance as to how to give effect to Te Mana o te Wai in the region. Rangitāne o Wairarapa do not consider it is necessary or particularly helpful to simply repeat the six principles which form part of the fundamental concept of Te Mana o te Wai, as part of the regional expression of the concept.	Remove the six principles of Te Mana o te Wai from the objective, as it is not necessary to repeat these here.	Accept
S168.032	Rangitāne O Wairarapa Inc	FS31.142	Sustainable Wairarapa inc	FS31.142	Sustainable Wairarapa inc	Objective 12	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is	Not stated	Accept

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								<p>highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.033	Rangitāne O Wairarapa Inc			S168.033	Rangitāne O Wairarapa Inc	Objective 12	Support in part	<p>The notified plan change is the first opportunity that Rangitāne o Wairarapa has had to fully comprehend how our statement of Te Mana o te Wai would be incorporated into the RPS. While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be</p>	Amend the plan change to ensure that the elements of Objective 12 as notified are moved into other provisions of the RPS (such as objectives, policies and methods) which more appropriately reflect the function of those elements.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								applied and when it shouldn't. As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which may be more effective if it was sitting in other parts of the RPS, such as in the policies or methods, or potentially in the Regional Plan.		
S168.033	Rangitāne O Wairarapa Inc	FS31.143	Sustainable Wairarapa inc	FS31.143	Sustainable Wairarapa inc	Objective 12	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based	Not stated	Accept in part

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								<p>solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.034	Rangitāne O Wairarapa Inc			S168.034	Rangitāne O Wairarapa Inc	Objective 12	Support in part	<p>The notified plan change is the first opportunity that Rangitāne o Wairarapa has had to fully comprehend how our statement of Te Mana o te Wai would be incorporated into the RPS. While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't. As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which may be more effective if it was sitting in other parts of the RPS, such as in the policies or methods, or potentially in the Regional Plan.</p>	Rangitāne o Wairarapa seeks an opportunity to work with the Council to determine which elements of the Te Mana o Te Wai statement should be incorporated into Objective 12, and which elements would more appropriately be incorporated in other parts of the RPS or regional plan.	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.034	Rangitāne O Wairarapa Inc	FS31.144	Sustainable Wairarapa inc	FS31.144	Sustainable Wairarapa inc	Objective 12	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Nga mihi nui Ian Gun		
S168.035	Rangitāne O Wairarapa Inc			S168.035	Rangitāne O Wairarapa Inc	Objective 12	Support in part	Rangitāne o Wairarapa are also concerned that there is no direction in this objective to implement mana whakahaere - tangata whenua should have the power and authority to make decisions on governance, management and operational projects for freshwater management, as set out in the NPS FM, and provided for through mechanisms in the RMA such as s33 - transfer of powers. Freshwater is a taonga for our whānau, hapū and iwi	Amend Objective 12 to provide that tangata whenua are actively involved in freshwater management and will lead decision making on strategy, management and implementation of operational initiatives related to fresh water, in order to give effect to Te Mana o te Wai. Including implementing mana whakahaere as set out in the NPS-FM and provided for through s33 of the RMA	Accept in part
S168.035	Rangitāne O Wairarapa Inc	FS31.145	Sustainable Wairarapa inc	FS31.145	Sustainable Wairarapa inc	Objective 12	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is		Accept in part

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								<p>highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S169.003	Kahungunu Ki Wairarapa			S169.003	Kahungunu Ki Wairarapa	Objective 12	Support	<p>On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy</p>	Retain as notified	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.		
S169.003	Kahungunu Ki Wairarapa	FS30.048	Beef + Lamb New Zealand Ltd	FS30.048	Beef + Lamb New Zealand Ltd	Objective 12	Support in part	In principle, B+LNZ support the inclusion of iwi expressions of Te Mana o Te Wai in PC1, however B+LNZ agree with Wellington Fish and Game that the concept of Te Mana o Te Wai forms the fundamental underpinning of the NPS-FM and that currently as drafted Objective 12 falls short of what is required under the NPSFM, particularly in regard to the engagement with communities to determine what the application of Te Mana o te Wai means in the GWR. We consider this an important step for the successful implementation of Te Mana o Te Wai.	Allow in part	Accept in part
S169.003	Kahungunu Ki Wairarapa	FS31.004	Sustainable Wairarapa inc	FS31.004	Sustainable Wairarapa inc	Objective 12	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.0197	Rangitāne O Wairarapa Inc			S168.0197	Rangitāne O Wairarapa Inc	Objective 12	Support in part	<p>The notified plan change is the first opportunity that Rangitāne o Wairarapa has had to fully comprehend how our statement of Te Mana o te Wai would be incorporated into the RPS. While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't. As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other</p>	<p>Rangitāne o Wairarapa seeks to amend part of their Te Mana o te Wai statement to remove a whakataukī and the supporting text.</p> <p>"A notable example of this is from the writings of Whatahoro Jury: Ko Waiōhine ko Ruamāhanga ēnei e wairua tipu mai i Tararua maunga e oranga e te iwi. These are Waiōhine and Ruamāhanga. They are like mother's milk flowing out of the Tararua mountains for the prosperity of the people. Nā Whatahoro Jury 1841-1923"</p>	Accept

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								content which may be more effective if it was sitting in other parts of the RPS, such as in the policies or methods, or potentially in the Regional Plan.		
S168.0197	Rangitāne O Wairarapa Inc	FS31.128	Sustainable Wairarapa inc	FS31.128	Sustainable Wairarapa inc	Objective 12	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of		Accept

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								options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui Ian Gun		
S34.070	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.070	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	No comment	No relief sought	No recommendation
S89.008	VicLabour			S89.008	VicLabour	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Support wording "joint decision-making between tangata whenua and GWRC for all decisions about our waterbodies". Support engaging with tangata whenua at the decision-making table, and them being able to make the decisions alongside GWRC, will result in better outcomes for our waterways	Retain as notified.	Accept
S102.042	Te Tumu Paeroa Office of the Māori Trustee			S102.042	Te Tumu Paeroa Office of the Māori Trustee	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Generally supports Rangitāne o Wairarapa Te Mana o te Wai expression.	Retain as notified.	Accept in part
S140.015	Wellington City Council (WCC)			S140.015	Wellington City Council (WCC)	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support in part	Support the need for of Iwi expression of Te Mana o te Wai, but there is a need to clarify whether they have regulatory weighting	Clarify the regulatory weighting of the Iwi expression of Te Mana o te Wai.	Accept
S140.015	Wellington City Council (WCC)	FS28.031	Horticulture New Zealand	FS28.031	Horticulture New Zealand	Statement of Rangitāne o Wairarapa Te	Support	HortNZ agree there could be greater clarity as to how the Te Mana o Te	Allow Allow relief providing clarity	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						Mana o te Wai expression		Wai expressions are given effect to/ integrated into the RPS		
S165.016	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.016	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Forest & Bird supports the inclusion of Te Mana o te Wai expressions.	Retain.	Accept
S165.016	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.060	Ātiawa ki Whakarongotai Charitable Trust	FS20.060	Ātiawa ki Whakarongotai Charitable Trust	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Ātiawa support the recognised mana whenua of the Wellington region expressing Te Mana o te Wai relevant to their rohe.	Allow	Accept
S165.016	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.002	Rangitāne O Wairarapa Inc			S168.002	Rangitāne O Wairarapa Inc	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support in part	While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't (i.e when developing, whose statement should be followed and who to engage for further details). As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which, for practical purposes, may be more effective if they were sitting in other parts of the RPS, such as in the policies or methods sections.	We ask that the Council, working with Rangitāne o Wairarapa Inc, amend the RPS to ensure that elements currently included in Objective 12 are fit for purpose, are appropriately located within the RPS, and can be readily interpreted and applied, in order to give effect to the National Policy Statement for Freshwater Management 2020 (NPS FM).	Accept
S168.002	Rangitāne O Wairarapa Inc	FS31.016	Sustainable Wairarapa inc	FS31.016	Sustainable Wairarapa inc	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise	Not stated	Accept

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								<p>your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S31.013	Robert Anker			S31.013	Robert Anker	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Oppose	This aspect is suggesting an action which would be illegal, and it is not appropriate for GWRC to be aligning itself with KkW Policy 10. In doing so they would appear to be encouraging others to commit an offense. It is not the place of GWRC to selectively observe legislation.	Remove KkW Policy 10.	Reject
S31.013	Robert Anker	FS2.129	Rangitāne o Wairarapa Inc	FS2.129	Rangitāne o Wairarapa Inc	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Oppose	Kahungunu ki Wairarapa have a right to articulate their te Mana o te Wai Statement as they see fit. Trout and Salmon are introduced ika that have destroyed our waterways and our native taonga (many ika and tuna species). Ignoring this would be not honouring Article 2 of Te Titiri o Waitangi.	Disallow	Accept

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S34.071	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.071	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	No comment	No relief sought	No recommendation
S96.011	Sarah (Dr) Kerkin			S96.011	Sarah (Dr) Kerkin	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support in part	This policy appears to be inconsistent with the national-level Freshwater Fisheries Regulations. The RPS should not require people to do anything that will incur additional compliance costs or liability under the Regulations.	Amend Policy 10 to resolve inconsistencies with the Freshwater Fisheries Regulations.	Reject
S96.011	Sarah (Dr) Kerkin	FS2.131	Rangitāne o Wairarapa Inc	FS2.131	Rangitāne o Wairarapa Inc	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Oppose	Kahungunu ki Wairarapa have a right to articulate their te Mana o te Wai Statement as they see fit. Trout and Salmon are introduced ika that have destroyed our waterways and our native taonga (many ika and tuna species). Ignoring this would be not honouring Article 2 of Te Titiri o Waitangi.	Disallow	Accept
S102.043	Te Tumu Paeroa Office of the Māori Trustee			S102.043	Te Tumu Paeroa Office of the Māori Trustee	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	Generally supports Kahungunu ki Wairarapa Te Mana o te Wai expression.	Retain as notified.	Accept
S165.017	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.017	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	Forest & Bird supports the inclusion of Te Mana o te Wai expressions	Retain	Accept
S165.017	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS2.77	Rangitāne o Wairarapa Inc	FS2.77	Rangitāne o Wairarapa Inc	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Rangitāne welcomes and supports Forest & Bird's support for the inclusion of Te Mana o te Wai expressions.	Allow	Accept
S165.017	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.061	Ātiawa ki Whakarongotai Charitable Trust	FS20.061	Ātiawa ki Whakarongotai Charitable Trust	Statement of Rangitāne o Wairarapa Te	Support	Ātiawa support the recognised mana whenua of the Wellington region expressing Te Mana o te Wai relevant to their rohe.	Allow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						Mana o te Wai expression				
S165.017	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject
S169.005	Kahungunu Ki Wairarapa			S169.005	Kahungunu Ki Wairarapa	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy		Accept

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								Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.		
S169.005	Kahungunu Ki Wairarapa	FS2.42	Rangitāne o Wairarapa Inc	FS2.42	Rangitāne o Wairarapa Inc	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Kahungunu ki Wairarapa have a right to articulate their te Mana o te Wai Statement as they see fit.	Allow	Accept
S169.005	Kahungunu Ki Wairarapa	FS30.049	Beef + Lamb New Zealand Ltd	FS30.049	Beef + Lamb New Zealand Ltd	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support in part	In principle, B+LNZ support the inclusion of iwi expressions of Te Mana o Te Wai in PC1, however B+LNZ agree with Wellington Fish and Game that the concept of Te Mana o Te Wai forms the fundamental underpinning of the NPS-FM and that currently as drafted Objective 12 falls short of what is required under the NPSFM, particularly in regard to the engagement with communities to determine what the application of Te Mana o te Wai means in the GWR. We consider this an important step for the successful implementation of Te Mana o Te Wai.	Allow in part	Accept in part
S169.005	Kahungunu Ki Wairarapa	FS31.006	Sustainable Wairarapa inc	FS31.006	Sustainable Wairarapa inc	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a	Not stated	Accept

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								<p>very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S11.024	Outdoor Bliss Heather Blissett			S11.024	Outdoor Bliss Heather Blissett	Table 4	Support in part	Protecting and enhancing the health and wellbeing of water bodies and freshwater ecosystems, then take and use of water.	Swap Policy 17 and Policy 40.	Reject
S34.067	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.067	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Table 4	Support in part	<p>Method 36</p> <p>The proposed method considered appropriate, however as no explanation has been provided for the method, Council's ability to provide comments is constrained. It is unclear</p>	Provide an explanation for the method and develop in conjunction with submitters.	Reject

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								<p>whether this method is a regulatory or non- regulatory method and Council notes there are no clear regulatory mechanisms for territorial authorities to utilise.</p> <p>Council also notes that industry led standards may also not be best practice, or in the greater public good.</p>		
S34.067	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	FS28.032	Horticulture New Zealand	FS28.032	Horticulture New Zealand	Table 4	Support in part	HortNZ support Method 36, to support Industry-led environmental accords and codes of practice	Allow in part Allow to the extent that Method 36 is retained	Reject
S129.020	Waka Kotahi NZ Transport Agency			S129.020	Waka Kotahi NZ Transport Agency	Table 4	Support in part	Generally supportive of Policy 45, Table 4, but it is noted that using water within work sites is essential in the way Waka Kotahi operate, maintain, and construct infrastructure. Therefore, it is necessary to clarify what 'efficiently' means in relation to water use.	Seeks that Policy 45, Table 4 be clarified to ensure the functional and operational needs of infrastructure is recognised and provided for.	Reject
S136.003	DairyNZ			S136.003	DairyNZ	Table 4	Oppose	Believe a more effective and efficient process would be to delay changes to the RPS, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3).	Delete changes and address issues through a full review of the RPS.	Reject
S136.003	DairyNZ	FS2.109	Rangitāne o Wairarapa Inc	FS2.109	Rangitāne o Wairarapa Inc	Table 4	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need	Disallow	Accept

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								action now for our future generations.		
S136.003	DairyNZ	FS30.009	Beef + Lamb New Zealand Ltd	FS30.009	Beef + Lamb New Zealand Ltd	Table 4	Support	B+LNZ agree it is inefficient to widen the scope of matters outside those required to give effect to the NPS-UD until such time as the necessary engagement has been completed and there is certainty with important national legislation for the NPS-IB and climate change.	Allow	Reject
S163.024	Wairarapa Federated Farmers			S163.024	Wairarapa Federated Farmers	Table 4	Oppose	Defer to the upcoming plan changes in 2023 for urban whitua, and 2024 for rural whitua.	Delete Table 4 OR Amend objectives and policies in Table 4 as per details in submission and make consequential amendments to related methods.	Reject
S163.024	Wairarapa Federated Farmers	FS2.115	Rangitāne o Wairarapa Inc	FS2.115	Rangitāne o Wairarapa Inc	Table 4	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept for mana whenua and although some iwi have contributed to the articulation of Te Mana o te Wai in the proposed changes to the RPS, others have chosen to define this through their Whitua process, as they see fit. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow	Accept
S163.024	Wairarapa Federated Farmers	FS7.068	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.068	Royal Forest and Bird Protection Society (Forest & Bird)	Table 4	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central	Disallow Disallow whole submission	Accept

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								government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.		
S163.024	Wairarapa Federated Farmers	FS20.190	Ātiawa ki Whakarongotai Charitable Trust	FS20.190	Ātiawa ki Whakarongotai Charitable Trust	Table 4	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept
S163.024	Wairarapa Federated Farmers	FS29.041	Ngā Hapu o Otaki	FS29.041	Ngā Hapu o Otaki	Table 4	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented. Wairarapa Federated Farmers	Not stated	Accept

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								indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.		
S163.024	Wairarapa Federated Farmers	FS30.097	Beef + Lamb New Zealand Ltd	FS30.097	Beef + Lamb New Zealand Ltd	Table 4	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Reject
S165.014	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.014	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Table 4	Support	This provides a fairly accurate table setting out policy titles and lead authorities.	Retain	Accept in part
S165.014	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Table 4	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S16.037	Kāpiti Coast District Council			S16.037	Kāpiti Coast District Council	Policy 12: Management of water bodies - regional plans	Support	Council notes the amendments to the policy give effect to the NPS- FM.	Retain	Accept in part
S16.047	Kāpiti Coast District Council			S16.047	Kāpiti Coast District Council	Policy 12: Management of water bodies - regional plans	Support	Council agrees the management of waterbodies, other than activities carried out on their surface, is a role best filled by GWRC as it has the expertise and clear management responsibility under the RMA for the maintenance and enhancement of the quality of water, the maintenance of the quantity of water in waterbodies, the maintenance and enhancement of ecosystems in water bodies, the control of the taking, use, damming and diversion of water, and the control of discharges of contaminants into water.	Retain	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.038	Porirua City Council			S30.038	Porirua City Council	Policy 12: Management of water bodies - regional plans	Support in part	<p>Council supports that these matters are addressed in a regional plan in accordance with the regional council's s30 functions. However, this policy unnecessarily duplicates requirements set out already in the NPS- FM, the role of an RPS should be to articulate what national direction means at a regional level. It is unclear what value is added by the inclusion of this policy.</p> <p>Also, clause (g) specifies a method which is not required as this is already listed in the chapeau of the policy.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in linewith objectives, and/or reword as follows:</p> <p>Regional plans shall give effect to <i>Te Mana o te Wai</i> and include objectives, policies, rules and/or methods that:</p> <p>(a) are prepared in partnership with mana whenua/ tangata whenua;</p> <p>(b) achieve the long-term visionsfor freshwater;</p> <p>(c) identify freshwater management units (FMUs);</p> <p>(d) identify valuesfor every FMU and environmental outcomes for theseas objectives;</p> <p>(e) identify targetattribute states that achieve environmental outcomes, and record their baseline state;</p> <p>(f) set environmental flows and levels that will achieve environmentaloutcomes and long-term visions;</p> <p>(g) identify limits on resource use including take limits that will achieve the target attribute states, flows and levels and include these as rules;</p> <p>(h) identify non-regulatory actions that will be includedin Action Plansthat will assist in achieving target attribute states (in addition tolimits); and</p> <p>(i) identify non-regulatory and regulatory actions in Actions Plans required by the NPS-FM</p>	Accept
S30.038	Porirua City Council	FS25.071	Peka Peka Farm Limited	FS25.071	Peka Peka Farm Limited	Policy 12: Management	Support	The submission provides a comprehensive analysis of the	Allow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						of water bodies - regional plans		proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.		
S32.011	Director-General of Conservation			S32.011	Director-General of Conservation	Policy 12: Management of water bodies - regional plans	Support in part	The proposed changes to this policy are appropriate as part of giving effect to the NPSFM 2020. However, they do not in themselves give complete effect, and the section references in the explanation are incomplete.	Retain the Policy as notified and make the following changes to the associated new explanation, or words to like effect: "Policy 12 gives sets out key elements of giving effect to the national direction set by the National Policy Statement for Freshwater Management 2020, including sections 2.2 , 3.2 and 3.8-3.17."	Accept
S32.011	Director-General of Conservation	FS20.005	Ātiawa ki Whakarongotai Charitable Trust	FS20.005	Ātiawa ki Whakarongotai Charitable Trust	Policy 12: Management of water bodies - regional plans	Support in part	There is no one single action that gives effect to Te Mana o te Wai. In its most simple expression, Te Mana o te Wai will be given effect to when the mauri of our arawai are healthy and thriving (and the NPS-FM has been implemented). Therefore, expanding reference to include 2.2, while useful to include for policy direction, does not provide an exhaustive list for giving effect to Te Mana o te Wai. In addition, as it is drafted the sections referenced by the council directly reference the matters covered in Policy 12. Ātiawa, however do not see any harm in included reference to section 2.2.	Allow	Accept

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S32.011	Director-General of Conservation	FS30.289	Beef + Lamb New Zealand Ltd	FS30.289	Beef + Lamb New Zealand Ltd	Policy 12: Management of water bodies - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject
S34.055	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.055	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy 12: Management of water bodies - regional plans	Support in part	<p>Council supports the intent of the policy to implement Te Mana o Te Wai.</p> <p>It is unclear what outcomes and visions need to be achieved under clause f)</p> <p>Council notes that the policy states regional plans will identify target attribute state, however it is unclear if/ how district plans are expected to respond and enforce these targets under Policy 15, and in response to</p>	Amend to provide more clarity on clause g) and the application of the policy.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								action plans required by 3.12 of the NPS-FM.		
S102.044	Te Tumu Paeroa Office of the Māori Trustee			S102.044	Te Tumu Paeroa Office of the Māori Trustee	Policy 12: Management of water bodies - regional plans	Support in part	Generally supports policy 12 in the 'Freshwater' chapter. However, to ensure tino rangatiratanga is exercised appropriately, affected Māori landowners should be included in the partnership.	Amend Policy 12 subclause (a) as follows: (a) are prepared in partnership with mana whenua / tangata whenua and affected Māori landowners;	Reject
S115.037	Hutt City Council			S115.037	Hutt City Council	Policy 12: Management of water bodies - regional plans	Support in part	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.	Accept
S115.037	Hutt City Council	FS10.018	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	FS10.018	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	Policy 12: Management of water bodies - regional plans	Support	Support the intent of the submission to amend Policy 12 to give effect to the NPS-FW in the regional context, rather than simply repeating the higher order direction, subject to review of any amended wording.	Allow Allow the submission and amend Policy 12 as sought. The Fuel Companies seek to be involved in the development of any amendments.	Accept
S115.037	Hutt City Council	FS19.017	Wellington Water Ltd ("Wellington Water")	FS19.017	Wellington Water Ltd ("Wellington Water")	Policy 12: Management of water bodies - regional plans	Support	Regional context would be helpful.	Allow	Accept
S115.037	Hutt City Council	FS24.014	Powerco Limited	FS24.014	Powerco Limited	Policy 12: Management of water bodies - regional plans	Support	Support the intent of the submission to amend Policy 12 to give effect to the NPS-FW in the regional context, rather than simply repeating the higher order direction, subject to review of any amended wording.	Allow Allow the submission and amend Policy 12 as sought. Powerco seeks to be involved in the development of any amendments.	Accept
S115.037	Hutt City Council	FS28.042	Horticulture New Zealand	FS28.042	Horticulture New Zealand	Policy 12: Management of water bodies - regional plans	Support	HortNZ agree that the policy duplicates the NPSFM and there would be value in applying the NPSFM direction in a regional context	Allow Allow (subject to specific amendment sought)	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S128.025	Horticulture New Zealand			S128.025	Horticulture New Zealand	Policy 12: Management of water bodies - regional plans	Support in part	<p>The policy in essence restates the requirements of the NPSFM 2020, however risks not capturing the full context.</p> <p>The amendment to (b) is sought to recognise that the NPSFM 2020 provides for the long-term visions for freshwater to be intergenerational. The changes to the NRP may only be one step along that journey in some cases (e.g. there can be interim target attribute states).</p> <p>Target attribute states and environmental flows and levels must be set in a way that will achieve the long-term vision.</p> <p>Limit setting must have regard to the long-term vision.</p>	<p>Amend Policy 12, to refer more generally to the regional plan implementing the requirements of the NPSFM 2020,</p> <p>OR</p> <p>Amend subclause (b) Achieve, or contribute to achieving, the long-term visions for freshwater;</p>	Accept in part
S128.025	Horticulture New Zealand	FS30.043	Beef + Lamb New Zealand Ltd	FS30.043	Beef + Lamb New Zealand Ltd	Policy 12: Management of water bodies - regional plans	Support	B+LNZ supports relief which recognises that long term visions may not be achieved within one generation.	Allow	Accept in part
S128.025	Horticulture New Zealand	FS20.020	Ātiawa ki Whakarongotai Charitable Trust	FS20.020	Ātiawa ki Whakarongotai Charitable Trust	Policy 12: Management of water bodies - regional plans	Oppose	Ātiawa are concerned that the relief sought minimises the intent of the NPS-FM, we oppose this approach. In regards to achieving visions for freshwater management, objectives, policies, and rules must be set to a standard that will achieve these visions, not only to contribute to achieving the visions.	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.061	Ātiawa ki Whakarongotai Charitable Trust			S131.061	Ātiawa ki Whakarongotai Charitable Trust	Policy 12: Management of water bodies - regional plans	Support in part	<p>In principle Ātiawa supports Policy 12, we support giving effect to Te Mana o te Wai, which is a statutory obligation, we are pleased that this policy sets out a clear framework for implementing the NPS-FM. Ātiawa seeks reference to mātauranga Māori to enable 'ki te tirohanga Māori' / Māori world view, values and systems, knowledge to be applied to freshwater management. The application of mātauranga Māori is provided for in the NPS-FM. In addition, Ātiawa seek reference to ki uta ki tai, an integrated approach is included as a subclause to Policy 12. Ātiawa has identified in our Kaitiakitanga Plan the value of natural order and balance; that the health of one component of the environment can not be understood in isolation from the whole, that all things are connected and that the well-being of the whole always has to be the frame within which kaitiakitanga is actioned. Freshwater must therefore be managed using a ki uta ki tai, an integrated approach, it is well understood that one part of the water cycle affects another - fragmented and piecemeal approaches to freshwater management only provide localised outcomes, or at times fail to achieve any meaningful improvement as they fail to address the key driver of poor freshwater quality and quantity. Ki uta ki tai must be applied to freshwater management to give effect to Te Mana o te Wai and in implementing the NPS-FM, and therefore create meaningful and measurable improvement to freshwater quality and quantity in</p>	Amend to: Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, rules and/or methods that: (a) are prepared in partnership with mana whenua / tangata whenua; (aa) enable the application of mātauranga Māori; (ab) adopt an integrated approach, ki uta ki tai; (b) achieve the long-term visions for freshwater; (c) identify freshwater management units (FMUs); (d) identify values for every FMU and environmental outcomes for these as objectives; (e) identify target attribute states that achieve environmental outcomes, and record their baseline state; (f) set environmental flows and levels that will achieve environmental outcomes and long-term visions; (g) identify limits on resource use including take limits that will achieve the target attribute states, flows and levels and include these as rules; (h) identify non-regulatory actions that will be included in Action Plans that will assist in achieving target attribute states (in addition to limits); and (i) identify non-regulatory and regulatory actions in Action Plans required by the NPS-FM	Accept in part

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								the region. Ātiawa notes that Te Mana o te Wai can only be interpreted by manawhenua, Ātiawa are yet to complete the process to contextualise this concept for our rohe. This process will occur concurrently to RPS Change 1. Therefore, further changes to the RPS will be required to give effect to Ātiawa interpretation of Te Mana o te Wai at the appropriate time.		
S131.061	Ātiawa ki Whakarongotai Charitable Trust	FS19.002	Wellington Water Ltd ("Wellington Water")	FS19.002	Wellington Water Ltd ("Wellington Water")	Policy 12: Management of water bodies - regional plans	Support	Ki uta ki tai approach is appropriate for managing water bodies.	Allow	Accept in part
S131.061	Ātiawa ki Whakarongotai Charitable Trust	FS29.331	Ngā Hapu o Otaki	FS29.331	Ngā Hapu o Otaki	Policy 12: Management of water bodies - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent</p>	Not stated	Accept in part

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								<p>awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S133.006	Muaūpoko Tribal Authority			S133.006	Muaūpoko Tribal Authority	Policy 12: Management of water bodies - regional plans	Oppose in part	<p>Supports the intent of this policy, particularly the partnership directive with mana whenua/tangata whenua. However, there are several amendments required to ensure it gives effect to Te Mana o te Wai and the NPSFM 2020. Long-terms visions and FMUs should be set out in the RPS, not the Regional Plan. Does not agree that whatua are appropriate areas to identify freshwater management units.</p> <p>The NPSFM section 3.8 (3) also requires regional councils to identify (if present):</p> <ul style="list-style-type: none"> • sites to be used for monitoring • primary contact sites • the location of habitats of threatened species • outstanding water bodies • natural inland wetlands. 	<p>Amend the RPS to:</p> <ul style="list-style-type: none"> • clarify the process identify FMUs • provide a policy or method to identify and define FMUs • provide a policy or method to identify (if present): sites to be used for monitoring, primary contact sites, the location of habitats of threatened species, outstanding water bodies, and natural inland wetlands. <p>Ensure Muaūpoko is given the opportunity to partner with GWRC for these processes.</p>	Accept in part
S133.006	Muaūpoko Tribal Authority	FS20.353	Ātiawa ki Whakarongotai Charitable Trust	FS20.353	Ātiawa ki Whakarongotai Charitable Trust	Policy 12: Management of water bodies - regional plans	Oppose	<p>Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the</p>	<p>Disallow</p> <p>Disallow the whole submission</p>	Accept in part

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								<p>extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and</p>		

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								mana whenua on the land, as we have undisturbed for over 198 years.		
S144.037	Sustainable Wairarapa Inc			S144.037	Sustainable Wairarapa Inc	Policy 12: Management of water bodies - regional plans	Support	Needed in order to give effect to the NPS for FM	Retain as notified.	Accept in part
S147.008	Wellington Fish and Game Council			S147.008	Wellington Fish and Game Council	Policy 12: Management of water bodies - regional plans	Support in part	Strongly support the proposed changes to Policy 12 to give effect to the NPS-FM. However, Proposed Change 1 does not incorporate a long-term vision for freshwater as set out in Section 3.3 of the NPS-FM. In the absence of a clear long-term vision in the RPS it is not clear how paragraph (b) of the proposed changes to Policy 12 will operate.	Seek clarification of paragraph (b): "achieve the long-term visions for freshwater;"	Accept in part
S147.008	Wellington Fish and Game Council	FS28.043	Horticulture New Zealand	FS28.043	Horticulture New Zealand	Policy 12: Management of water bodies - regional plans	Support in part	HortNZ agree that there is uncertainty as to how the provisions apply ahead of long-term visions being set.	Allow in part Allow amendment providing clarity	Accept
S147.008	Wellington Fish and Game Council	FS19.072	Wellington Water Ltd ("Wellington Water")	FS19.072	Wellington Water Ltd ("Wellington Water")	Policy 12: Management of water	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS. Most of the amendments sought do not in any event properly reflect	Disallow	Reject

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						bodies - regional plans		the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9. Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified. Some of the amendments undermine the more detailed content of PC1.		
S147.008	Wellington Fish and Game Council	FS30.177	Beef + Lamb New Zealand Ltd	FS30.177	Beef + Lamb New Zealand Ltd	Policy 12: Management of water bodies - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Reject
S163.052	Wairarapa Federated Farmers			S163.052	Wairarapa Federated Farmers	Policy 12: Management of water	Oppose	Defer to full review of the RPS in 2024	That the amendments to Policy 12 be deleted	Reject

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						bodies - regional plans		Refer to submission for more detail on partnership principles.		
S163.052	Wairarapa Federated Farmers	FS7.095	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.095	Royal Forest and Bird Protection Society (Forest & Bird)	Policy 12: Management of water bodies - regional plans	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept
S163.052	Wairarapa Federated Farmers	FS20.217	Ātiawa ki Whakarongotai Charitable Trust	FS20.217	Ātiawa ki Whakarongotai Charitable Trust	Policy 12: Management of water bodies - regional plans	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept
S163.052	Wairarapa Federated Farmers	FS29.068	Ngā Hapu o Otaki	FS29.068	Ngā Hapu o Otaki	Policy 12: Management of water bodies - regional plans	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that	Not stated	Accept

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								<p>Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>		
S163.052	Wairarapa Federated Farmers	FS30.124	Beef + Lamb New Zealand Ltd	FS30.124	Beef + Lamb New Zealand Ltd	Policy 12: Management of water bodies - regional plans	Support	<p>B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.</p>	Allow	Reject
S165.047	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.047	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 12: Management of water bodies - regional plans	Support in part	<p>While the intent of this policy is supported, there is a risk that paraphrasing the implementation requirements of the NPSFM will change their meaning. The policy needs to be clear that the NPSFM requirements remain paramount, despite the paraphrasing in this policy.</p>	<p>Amend the policy:</p> <p>Regional plans shall give effect to Te Mana o te Wai and the implementation requirements of the NPSFM, and include objectives, policies, rules and/or methods that:</p> <p>Add a note at the bottom of the policy:Where there is a difference between the listed requirements above and those of</p>	Reject

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									<p>the NPSFM, the NPSFM will prevail.</p> <p>Make any further amendments to ensure Part 3 of the NPSFM is given effect to.</p>	
S165.047	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS28.044	Horticulture New Zealand	FS28.044	Horticulture New Zealand	Policy 12: Management of water bodies - regional plans	Support in part	The proposed drafting relief sought provides a means of addressing differences with the NPSFM.	<p>Allow in part</p> <p>Allow amendments that address avoiding conflict with national direction</p>	Reject
S165.047	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 12: Management of water bodies - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S167.075	Taranaki Whānui			S167.075	Taranaki Whānui	Policy 12: Management of water bodies - regional plans	Support	Taranaki Whānui supports the amendments to Policy 12. We are keen to see clear statements around the resourcing/funding and capability building of mana whenua in this partnership (Method FW.1)	Retain as notified.	Accept in part
S168.036	Rangitāne O Wairarapa Inc			S168.036	Rangitāne O Wairarapa Inc	Policy 12: Management of water bodies - regional plans	Oppose in part	<p>Rangitāne o Wairarapa support the intent of this policy, in particular that objectives, policies, rules and or methods will be prepared in partnership with tangata whenua. However, we have several concerns about the provision as currently drafted.</p> <p>The provision essentially paraphrases the NPS, sometimes inaccurately, including in relation to the sequence of steps that must be followed, which is not particularly helpful. The provision also does not provide any additional direction at the regional level.</p> <p>Long term visions must be set out in the RPS. Practically, the FMUs must also be identified in the RPS, rather than the Regional Plan, as the long-term visions relate to the FMUs. There is a sequencing issue with clause b and c. FMUs must be identified before long-term visions can be developed.</p>	<p>Amend the policy:</p> <p>So that it is clear that FMUs will be identified in the RPS, and will be identified as a first step, before the development of the long-term visions, and that this will occur before the regional plan is made or modified.</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.036	Rangitāne O Wairarapa Inc	FS31.146	Sustainable Wairarapa inc	FS31.146	Sustainable Wairarapa inc	Policy 12: Management of water bodies - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Nga mihi nui Ian Gun		
S168.037	Rangitāne O Wairarapa Inc			S168.037	Rangitāne O Wairarapa Inc	Policy 12: Management of water bodies - regional plans	Oppose in part	<p>Rangitāne do not agree that the whitua are appropriate to be defined as FMUs Long term visions must be set out in the RPS. Practically, the FMUs must also be identified in the RPS, rather than the Regional Plan, as the long-term visions relate to the FMUs. There is a sequencing issue with clause b and c. FMUs must be identified before long-term visions can be developed. Rangitāne do not agree that the whitua are appropriate to be defined as FMUs. Values, land uses, geology, climate influence parts of those whitua differently and the management responses may need to be different in those different areas. Rangitāne o Wairarapa note their position here that it is important that values for each of the FMUs are defined, rather than relying on a broad, generic set of values.</p> <p>In addition, if FMUs are being identified, clause 3.8 of the NPS FM directs that regional councils must also identify, if they are present: monitoring sites, primary contact sites, the location of habitats of</p>	To correctly reference the sequence of steps in the NOF process in the NPS FM (clause e). The sequence should be to firstly identify attributes, then record the baseline state, and then set target attributes that achieve the environmental outcome and long-term visions. Amend clause (e) so that this order of events is clear and reflects the NPS FM.	Accept

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								threatened species, outstanding water bodies and natural inland wetlands within the FMUs. When will these matters be addressed and incorporated into the RPS? The section 32 report is silent on this.		
S168.037	Rangitāne O Wairarapa Inc	FS31.147	Sustainable Wairarapa inc	FS31.147	Sustainable Wairarapa inc	Policy 12: Management of water bodies - regional plans	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based	Not stated	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S169.007	Kahungunu Ki Wairarapa			S169.007	Kahungunu Ki Wairarapa	Policy 12: Management of water bodies - regional plans	Support	<p>On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.</p>	Retain as notified	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S169.007	Kahungunu Ki Wairarapa	FS31.008	Sustainable Wairarapa inc	FS31.008	Sustainable Wairarapa inc	Policy 12: Management of water bodies - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

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								Nga mihi nui Ian Gun		
S170.026	Te Rūnanga o Toa Rangatira			S170.026	Te Rūnanga o Toa Rangatira	Policy 12: Management of water bodies - regional plans	Support in part	<p>This policy does not make clear whose objectives that we are setting our vision for. Tangata Whenua objectives are not the same with the communities', the Crown's, or the Councils'. There are not clauses that mention Mana Whenua identifies Freshwater Management Units (FMUs), environmental flows, environmental outcomes, and limits co-designing with the Council.</p> <p>FMUs need to align with Sites of Significance to iwi and Māori, and this has not been mentioned or referred to in this Policy.</p>	All sub-clauses could be re-phrased to say ' co-designed with Mana Whenua '	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S170.026	Te Rūnanga o Toa Rangatira	FS29.140	Ngā Hapu o Otaki	FS29.140	Ngā Hapu o Otaki	Policy 12: Management of water bodies - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		
S168.0198	Rangitāne O Wairarapa Inc			S168.0198	Rangitāne O Wairarapa Inc	Policy 12: Management of water bodies - regional plans	Oppose in part	<p>Rangitāne do not agree that the whitua are appropriate to be defined as FMUs. Values, land uses, geology, climate influence parts of those whitua differently and the management responses may need to be different in those different areas. Rangitāne o Wairarapa note their position here that it is important that values for each of the FMUs are defined, rather than relying on a broad, generic set of values.</p>	Amend the RPS to provide a policy or method which explains how the FMUs will be identified and defined in partnership with tangata whenua, along with the associated long-term visions; and how these matters will be incorporated in the RPS (for example through a future plan change). It is not appropriate to rely on the s32 report to explain this.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.0198	Rangitāne O Wairarapa Inc	FS31.129	Sustainable Wairarapa inc	FS31.129	Sustainable Wairarapa inc	Policy 12: Management of water bodies - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Nga mihi nui Ian Gun		
S168.0199	Rangitāne O Wairarapa Inc			S168.0199	Rangitāne O Wairarapa Inc	Policy 12: Management of water bodies - regional plans	Oppose in part	In addition, if FMUs are being identified, clause 3.8 of the NPS FM directs that regional councils must also identify, if they are present: monitoring sites, primary contact sites, the location of habitats of threatened species, outstanding water bodies and natural inland wetlands within the FMUs. When will these matters be addressed and incorporated into the RPS? The section 32 report is silent on this. Clause (e) confuses several steps in the NOF process and this needs to be corrected. As whānau, hapū and Iwi - Rangitāne o Wairarapa, our wai is our top priority and we want to be the leading authority for this policy.	Rangitāne o Wairarapa seek that the FMUs are identified in the RPS and take into account tangata whenua mātauranga when defining them. The Whaitua's are too large to be defined as FMUs. The new policy or method must explain how items within each FMU listed in clause 3.8 of the NPS FM will be identified (monitoring sites, primary contact sites, the location of habitats of threatened species, outstanding water bodies and natural inland wetlands). Rangitāne o Wairarapa must be involved in this process of identification. We want to be the leading authority for this policy.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.0199	Rangitāne O Wairarapa Inc	FS31.130	Sustainable Wairarapa inc	FS31.130	Sustainable Wairarapa inc	Policy 12: Management of water bodies - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Nga mihi nui Ian Gun		
S32.012	Director-General of Conservation			S32.012	Director-General of Conservation	Policy 13: Allocating water - regional plans	Oppose	The reason given for proposing deletion of this Policy is that it is covered by the proposed Policy 12. However, Policy 12 focusses on process rather than outcomes, whereas the existing Policy 13 provides specific guidance to take account of aquatic ecosystem health and saltwater intrusion.	Decline the proposed change and retain the operative version of Policy 13.	Reject
S32.012	Director-General of Conservation	FS20.006	Ātiawa ki Whakarongotai Charitable Trust	FS20.006	Ātiawa ki Whakarongotai Charitable Trust	Policy 13: Allocating water - regional plans	Oppose	Ātiawa oppose Policy 13, current water allocation policy and mechanism are not mana enhancing for mana whenua, nor does this approach reflect Te Tiriti o Waitangi which guaranteed tino rangatiratanga over the land, waterways and all other taonga. Policy 13 is outdated policy and not in accordance with the NPS-FM. Salt water intrusion and taking into account aquatic ecosystem health will be better provided for and addressed by readdressing water allocation, as provided for by the NPS-FM.	Disallow Disallow. Retain deletion of operative Policy 13 as notified.	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S32.012	Director-General of Conservation	FS30.290	Beef + Lamb New Zealand Ltd	FS30.290	Beef + Lamb New Zealand Ltd	Policy 13: Allocating water - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept
S115.038	Hutt City Council			S115.038	Hutt City Council	Policy 13: Allocating water - regional plans	Support	Support deletion as proposed	Delete Policy 13 as proposed	Accept
S131.062	Ātiawa ki Whakarongotai Charitable Trust			S131.062	Ātiawa ki Whakarongotai Charitable Trust	Policy 13: Allocating water - regional plans	Support	Ātiawa supports the proposed deletion of Policy 13, given that water allocation will be addressed through new policies introduced as part of RPS Change 1 in accordance with the national direction to assess environmental flows and levels and identify take limits. Ātiawa look forward to addressing this important	Retain proposed deletion.	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								and sensitive issue through the Whaitua o Kāpiti process.		
S131.062	Ātiawa ki Whakarongotai Charitable Trust	FS29.332	Ngā Hapu o Otaki	FS29.332	Ngā Hapu o Otaki	Policy 13: Allocating water - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional</p>	Not stated	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S140.039	Wellington City Council (WCC)			S140.039	Wellington City Council (WCC)	Policy 13: Allocating water - regional plans	Support	Support as proposed.	Retain as notified.	Accept
S165.048	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.048	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 13: Allocating water - regional plans	Support	Support deletion of outdated policy	Support deletion	Accept
S165.048	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.073	Ātiawa ki Whakarongotai Charitable Trust	FS20.073	Ātiawa ki Whakarongotai Charitable Trust	Policy 13: Allocating water - regional plans	Support in part	Ātiawa support the deletion of Policy 13.	Allow	Accept
S165.048	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 13: Allocating water - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S167.076	Taranaki Whānui			S167.076	Taranaki Whānui	Policy 13: Allocating water - regional plans	Support		Retain as notified.	Accept
S16.048	Kāpiti Coast District Council			S16.048	Kāpiti Coast District Council	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Council notes the management of all the listed actions in the policy fall under the statutory functions of regional councils under the RMA. This being the case GWRC can include regulatory methods in its regional plan(s) to require and manage these actions. This could be achieved via making amendments to relevant PNRP rules to give effect to the NPS-FM and NPS-UD such as Rule R50: Stormwater from new subdivision and development. Council requests the actions that are directly relevant to urban development and subdivision design are developed by GWRC in collaboration with the technical experts of the city and district councils in the region.	Amend as follows: (k) Require stormwater quality management that will minimise the generation transportation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater; and	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Council notes clause (k) of the policy implies that stormwater systems generate contaminants, however this is not the case. Stormwater systems transport contaminants and it is important this distinction is made clear. Council also notes stormwater systems transport contaminants from many sources that are beyond the control of city and district councils who own stormwater infrastructure - such as contaminants from vehicles using roads, private carparks, and any unlawful discharges made by persons to the stormwater network via stormwater grates in roads etc. Whilst Council supports the inclusion of to the extent practicable in the policy, we consider clause (k) is founded on a misconception of how stormwater networks function, and with who responsibility for contaminants within stormwater sits.		
S30.039	Porirua City Council			S30.039	Porirua City Council	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions.</p> <p>Council generally supports the intent of this policy. However, this policy needs to be drafted as a policy rather than a statement, and listed items need to grammatically link to the chapeau of the policy. It also duplicates a number of other policies in the RPS, for example, clause (e) duplicates Policy 15, clause (i) duplicates (and is inconsistent with) Policy 18(o).</p>	Regional plans shall include objectives, policies, rules and methods including rules, must that give effect to <i>Te Mana o te Wai</i> and in doing so must: (a) Enable the active involvement of mana whenua/ tangata whenua in freshwater management (including decision-making processes); and (b) Identify and provide for Māori freshwater values are identified and provided for; (c) Require the control of both land use and discharge effects from the use and development of land on freshwater and the coastal marine area; (d) Achieve the target	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									<p>attribute states set for the catchment;</p> <p>(e) Require the development, including stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan;</p> <p>(f) Require that urban development is designed and constructed using the principles of Water Sensitive Urban Design;</p> <p>(g) Require that urban development located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours;</p> <p>(h) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;(i) Require riparian buffers for all waterbodies and avoid to the piping of rivers;</p> <p>(j) Require <i>hydrological controls</i> to avoid adverse effects of runoff quantity (flows and volumes)and maintain, to the extent practicable, natural stream flows;</p> <p>(k) Require stormwater quality management that will minimise the generation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater; and Identify and map rivers and wetlands.</p>	

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.039	Porirua City Council	FS25.072	Peka Peka Farm Limited	FS25.072	Peka Peka Farm Limited	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part
S32.013	Director-General of Conservation			S32.013	Director-General of Conservation	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area. They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.	Retain as notified, except for the following changes or words to like effect: (h) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries and the coastal marine area;	Reject
S32.013	Director-General of Conservation	FS19.012	Wellington Water Ltd ("Wellington Water")	FS19.012	Wellington Water Ltd ("Wellington Water")	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	The unconsidered use of Te Mana o te Wai in coastal locations could bring the NPS-FM into play, without considering the impacts of implementing the NZCPS.	Disallow	Accept
S32.013	Director-General of Conservation	FS20.007	Ātiawa ki Whakarongotai Charitable Trust	FS20.007	Ātiawa ki Whakarongotai Charitable Trust	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Ātiawa recognise the impact that urban development can have and continues to have on the coastal marine area, and therefore the need to protect the coastal marine area from urban development.	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S32.013	Director-General of Conservation	FS30.291	Beef + Lamb New Zealand Ltd	FS30.291	Beef + Lamb New Zealand Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept
S32.026	Director-General of Conservation			S32.026	Director-General of Conservation	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area. They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.	Add a new subclause: "Require that urban development is located and designed to allow water bodies to meander and move naturally" .	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S32.026	Director-General of Conservation	FS20.013	Ātiawa ki Whakarongotai Charitable Trust	FS20.013	Ātiawa ki Whakarongotai Charitable Trust	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Ātiawa support actions that enable streams to flow, move and meander naturally, including daylighting of streams.	Allow	Accept in part
S32.026	Director-General of Conservation	FS30.304	Beef + Lamb New Zealand Ltd	FS30.304	Beef + Lamb New Zealand Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S34.066	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.066	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose in part	<p>This uses general and undefined terms including 'urban development', 'requiring the control' and 'require the development'. This creates unnecessary confusion and will result in inequal application of the policy. Clarity is required to determine if development includes small scale rural development, especially where it adjoins urban zones, and thresholds relating to clause (e). Through clause e), GWRC is acting in ultra vires, as it relates to limits which have not yet been defined. The policy direction is very strong in respect of the need to protect and enhance features under (h). This places resource burdens on territorial authorities and developments and goes beyond what is required by section 3.5 (4) if the NPS-FM</p> <p>Council is concerned that (i) would relate to very small streams and wetlands even if they are ephemeral. Urban development design required under (f) would also appear to require a change to district plans as well as (l), to give effect to mapped rivers and wetlands. Council notes that this put resource burdens on territorial authorities. A definition of wetland is required. It is unclear whether the use within the RPS is consistent with the definition under the NPS-FM.</p>	<p>Amend to clarify definitions of identified undefined terms.</p> <p>Clarify role of urban Māori and how they are represented.</p> <p>Amend policy to address comments.</p> <p>Amend (i) to read:</p> <p>"Require riparian buffers for all natural waterbodies and avoid piping of rivers where practicable"</p>	Accept in part
S79.028	South Wairarapa District Council			S79.028	South Wairarapa District Council	Policy 14: Urban development effects on freshwater and the coastal marine	Support in part	<p>This policy is generally supported in that the matters contained within it are best managed or directed by a Regional Authority and their functions under s.30 of the RMA. Similarly, the roles of TA's, including as owners and operators of infrastructure, ensures that the matters can be addressed as</p>	<p>Retain as notified</p> <p>Include method that develops non- regulatory guidance on good practice to achieve the policy.</p>	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						area - regional plans		conditions attached to consents, particularly for stormwater. Council does have concerns that any required planting for open water races in an urban setting would preclude maintenance and result in overtopping or counterintuitive outcomes for water quality. Council would support the development of good practice guidelines and engineering standards to assist implementation where they are not currently available.		
S79.028	South Wairarapa District Council	FS14.026	Masterton District Council	FS14.026	Masterton District Council	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>Agree with:</p> <p>This policy is generally supported in that the matters contained within it are best managed or directed by a Regional Authority and their functions under s.30 of the RMA. Similarly, the roles of TA's, including as owners and operators of infrastructure, ensures that the matters can be addressed as conditions attached to consents, particularly for stormwater.</p> <p>Council does have concerns that any required planting for open water races in an urban setting would preclude maintenance and result in overtopping or counterintuitive outcomes for water quality.</p> <p>Council would support the development of good practice guidelines and engineering standards to assist implementation where they are not currently available.</p>	Not stated Agree with relief sought: Retain as notified Include method that develops non- regulatory guidance on good practice to achieve the policy.	Accept
S102.045	Te Tumu Paeroa Office of the Māori Trustee			S102.045	Te Tumu Paeroa Office of the Māori Trustee	Policy 14: Urban development effects on freshwater	Support in part	Considers there is an express need for iwi, hapū and affected landowners to identify and map rivers, and in particular wetlands with the regional and district councils. This will	Amend Policy 14 clause (l) to read: (l) Identify and map rivers and	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						and the coastal marine area - regional plans		guarantee that Māori landowners have the opportunity to ensure water bodies of significance to them are appropriately identified.	wetlands in conjunction with iwi, hapū and affected landowners.	
S102.045	Te Tumu Paeroa Office of the Māori Trustee	FS2.101	Rangitāne o Wairarapa Inc	FS2.101	Rangitāne o Wairarapa Inc	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Rangitāne support the amendment to Objective 14 proposed by Te Tumu Paeroa. Mana whenua should have a role in this process.	Allow	Accept in part
S113.016	Wellington Water			S113.016	Wellington Water	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	This policy is reliant on the definition of hydrological controls, which is a very unclear definition. Clarity would be improved by adding the suggested wording to these this clause.	Add the following to subclause 14(j): Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;	Reject
S113.019	Wellington Water			S113.019	Wellington Water	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	'Minimise' and 'maximise' are too strong, unless defined consistently with the pNRP	Include definitions for minimise and maximise consistent with the pNRP	Accept
S115.039	Hutt City Council			S115.039	Hutt City Council	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	This policy duplicates other polices in the RPS. (e.g. Policy 15 (i))	Redraft Policy 14 to remove duplication	Accept

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S118.010	Peka Peka Farm Limited			S118.010	Peka Peka Farm Limited	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Policy 14 is directive to regional plans. Sub-sections (f) and (g) and (h) relate to requirements on urban development which, without appropriate qualification, may be outside of the scope of a regional plan. Some of these matters are also replicated in Policy FW.3 and Policy 15.	Delete or appropriately qualify sub-sections (f), (g) and (h) of Policy 14. Amend Policy 14 to not duplicate Policy FW.3 and Policy 15.	Accept in part
S131.063	Ātiawa ki Whakarongotai Charitable Trust			S131.063	Ātiawa ki Whakarongotai Charitable Trust	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Ātiawa supports the overall intent of Policy 14, the policy includes much greater controls and checks for managing the effects of urban development on freshwater and the coastal marine area, including recognising and providing for mana whenua freshwater values.	Retain as notified.	Accept in part
S131.063	Ātiawa ki Whakarongotai Charitable Trust	FS29.333	Ngā Hapu o Otaki	FS29.333	Ngā Hapu o Otaki	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community. There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes. This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent	Not stated	Accept in part

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								<p>awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S133.007	Muaūpoko Tribal Authority			S133.007	Muaūpoko Tribal Authority	Policy 14: Urban development effects on freshwater and the	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						coastal marine area - regional plans				
S133.007	Muaūpoko Tribal Authority	FS20.354	Ātiawa ki Whakarongotai Charitable Trust	FS20.354	Ātiawa ki Whakarongotai Charitable Trust	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muaūpoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial</p>	<p>Disallow</p> <p>Disallow the whole submission</p>	Accept in part

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								extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.		
S137.004	Greater Wellington Regional Council (GWRC)			S137.004	Greater Wellington Regional Council (GWRC)	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part		Amend Policy 14 as follows: Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, and methods including rules that, must give effect to Te Mana o te Wai and in doing so must: ... (e) Require the urban development, including stormwater discharges, earthworks and vegetation clearance to meet any limits set in a regional plan;	Accept
S137.004	Greater Wellington Regional Council (GWRC)	FS13.019	Wellington City Council	FS13.019	Wellington City Council	Policy 14: Urban development effects on freshwater and the	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						coastal marine area - regional plans				
S140.040	Wellington City Council (WCC)			S140.040	Wellington City Council (WCC)	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	The new policy requires urban development to protect gully heads. This differs from the other features in this policy 14(h) in that it is not a freshwater body. Earthworks around gully heads can reduce erosion risk and can create more usable areas for development, which reduces the greenfield areas needed to house population growth and meets NPS-UD objectives. Urban development is already required in (g) to follow existing land contours "to the extent practicable"	Amend as following: ... (h) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries	Accept
S147.052	Wellington Fish and Game Council			S147.052	Wellington Fish and Game Council	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified	Accept in part
S147.052	Wellington Fish and Game Council	FS19.116	Wellington Water Ltd ("Wellington Water")	FS19.116	Wellington Water Ltd ("Wellington Water")	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS. Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9. Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified. Some of the amendments	Disallow	Reject

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								undermine the more detailed content of PC1.		
S147.052	Wellington Fish and Game Council	FS30.221	Beef + Lamb New Zealand Ltd	FS30.221	Beef + Lamb New Zealand Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Reject
S148.036	Wellington International Airport Ltd (WIAL)			S148.036	Wellington International Airport Ltd (WIAL)	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose in part	WIAL is concerned that this policy has applied the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area. There are separate provisions relating to the management of the coastal environment and coastal marine area in the RPS. It is also confusing to have coastal policies in the Freshwater chapter and has the potential to	Delete reference to the coastal marine area in this policy and explanation. Ensure it only applies to freshwater and is consistent with the National Policy Statement for Freshwater Management 2020.	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								cause interpretation problems in the future.		
S157.024	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.024	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For</p>	Amend subclause (c) Require the management control of both land use and discharge effects from the use and development of land on freshwater and the coastal marine area;	Reject

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								<p>example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge. A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work. The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single</p>		

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								development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management. A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.		
S157.024	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS19.040	Wellington Water Ltd ("Wellington Water")	FS19.040	Wellington Water Ltd ("Wellington Water")	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	The submission's approach fails to implement the NPS-FM and changes to clause (j) don't provide for drinking water protection.	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S157.025	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.025	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan</p>	Amend. (d) Identify how to Achieve the target attribute states set for the catchment;	Accept

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								<p>is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge. A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work. The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not</p>		

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								by stormwater quality management. A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.		
S157.025	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS19.041	Wellington Water Ltd ("Wellington Water")	FS19.041	Wellington Water Ltd ("Wellington Water")	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	The submission's approach fails to implement the NPS-FM and changes to clause (j) don't provide for drinking water protection.	Disallow	Reject
S157.025	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS3.018	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.018	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 14: Urban development effects on freshwater and the coastal marine	Support in part	Waka Kotahi agrees in part with the submission point, in that avoiding of all adverse effects in all circumstances is unlikely to be achievable - particularly where it relates to hydrological control	Not stated Waka Kotahi seeks that the policy is amended to provide for some flexibility in certain situations	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						area - regional plans			when it comes to hydrological control.	
S157.026	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.026	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils. Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges,</p>	Amend. (e) Require the development, including stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan to the extent practicable;	Reject

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								<p>earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge. A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work. The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are</p>		

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								typically generated by the way in which land is used or developed, not by stormwater quality management. A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.		
S157.026	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS19.042	Wellington Water Ltd ("Wellington Water")	FS19.042	Wellington Water Ltd ("Wellington Water")	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	The submission's approach fails to implement the NPS-FM and changes to clause (j) don't provide for drinking water protection.	Disallow	Accept
S157.026	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS3.019	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.019	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Waka Kotahi agrees in part with the submission point, in that avoiding of all adverse effects in all circumstances is unlikely to be achievable - particularly where it relates to hydrological control.	Not stated Waka Kotahi seeks that the policy is amended to provide for some flexibility in certain situations when it comes to hydrological control.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S157.027	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.027	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils. Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need</p>	Amend. (f) Require that urban development is designed and constructed using the principles of Water Sensitive Urban Design applicable to the development type ;	Reject

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								<p>for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge. A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work. The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management. A requirement to avoid piping of</p>		

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								rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.		
S157.027	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS19.043	Wellington Water Ltd ("Wellington Water")	FS19.043	Wellington Water Ltd ("Wellington Water")	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	The submission's approach fails to implement the NPS-FM and changes to clause (j) don't provide for drinking water protection.	Disallow	Accept

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S157.028	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.028	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils. Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need</p>	(g) Require that urban development is located and designed to minimise the extent and volume of earthworks to the extent practicable and to follow, to the extent practicable, existing land contours;	Reject

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								<p>for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge. A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work. The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management. A requirement to avoid piping of</p>		

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								rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.		
S157.028	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS19.044	Wellington Water Ltd ("Wellington Water")	FS19.044	Wellington Water Ltd ("Wellington Water")		Oppose	The submission's approach fails to implement the NPS-FM and changes to clause (j) don't provide for drinking water protection.	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S157.029	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.029	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils. Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need</p>	(h) Require that urban development is located and designed to reduce the potential for adverse effects on protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge. A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work. The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management. A requirement to avoid piping of</p>		

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								rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.		
S157.029	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS17.017	Wellington International Airport Limited ("WIAL")	FS17.017	Wellington International Airport Limited ("WIAL")	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	WIAL support the relief sought as it is consistent with Part 2 and provisions of the Act, the New Zealand Coastal Policy Statement and other relevant statutory documents.	Allow	Reject
S157.029	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS19.045	Wellington Water Ltd ("Wellington Water")	FS19.045	Wellington Water Ltd ("Wellington Water")	Policy 14: Urban development effects on freshwater and the coastal marine	Oppose	The submission's approach fails to implement the NPS-FM and changes to clause (j) don't provide for drinking water protection.	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						area - regional plans				
S157.030	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.030	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils. Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges,</p>	(j) Require hydrological controls to avoid reduce adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;	Reject

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								<p>earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge. A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work. The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are</p>		

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								typically generated by the way in which land is used or developed, not by stormwater quality management. A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.		
S157.030	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS19.046	Wellington Water Ltd ("Wellington Water")	FS19.046	Wellington Water Ltd ("Wellington Water")	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	The submission's approach fails to implement the NPS-FM and changes to clause (j) don't provide for drinking water protection.	Disallow	Accept
S157.030	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS3.020	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.020	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 14: Urban development effects on freshwater and the coastal marine	Support in part	Waka Kotahi agrees in part with the submission point, in that avoiding of all adverse effects in all circumstances is unlikely to be achievable - particularly where it relates to hydrological control..	Not stated Waka Kotahi seeks that the policy is amended to provide for some flexibility in certain situations when it comes to hydrological control	Reject

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						area - regional plans				
S157.031	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.031	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils. Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges,</p>	(k) Require subdivision, use and development to adopt stormwater quality management measures that will minimise the generation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater to the extent practicable ; and	Accept in part

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								<p>earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge. A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work. The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are</p>		

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								<p>typically generated by the way in which land is used or developed, not by stormwater quality management. A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p> <p>[Note: Submission references to prior submission point S157.023]</p>		
		FS19.047	Wellington Water Ltd ("Wellington Water")	FS19.047	Wellington Water Ltd ("Wellington Water")	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	The submission's approach fails to implement the NPS-FM and changes to clause (j) don't provide for drinking water protection.	Disallow	Accept in part
S158.019	Kāinga Ora Homes and Communities			S158.019	Kāinga Ora Homes and Communities	Policy 14: Urban development effects on freshwater and the coastal marine	Support in part	Notes the NPS-FM does not prohibit the piping of rivers, but rather implements the effects management hierarchy of avoid, mitigate and remedy.	Amend sub-point (i) as follows: (i) Require riparian buffers for all waterbodies and avoid piping of rivers where practicable and where the effects cannot be avoided, they are minimised or	Accept in part

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						area - regional plans			remedied. Aquatic offsetting or compensation may be used where the piping of the river cannot be avoided, minimised or remedied.	
		FS3.021	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.021	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Waka Kotahi supports the submission point and considers that alignment with the NPS FM is appropriate.	Allow	Accept in part
S165.049	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.049	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose in part	This policy appears to be restricted to the effects of urban development on freshwater. If that is the case, then the chapeau should be amended and policy (l) removed so that mapping of rivers and wetlands is required generally and not just in relation to urban development. Further policies are required to ensure there is no further loss of extent of natural inland wetlands.	Amend the chapeau as follows: In managing the effects of urban development , Rregional plan objectives, policies, and methods including rules, must give effect to Te Mana o te Wai and in doing so must: ... Include a new policy: (x) require that urban development avoids the loss of extent or values of natural inland wetlands. Remove clause (l) and insert a separate standalone provision to direct the identification and mapping of rivers and wetlands	Accept in part
S165.049	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of	Disallow	Reject

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								the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S166.026	Masterton District Council			S166.026	Masterton District Council	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Not Stated / Neutral	Further clarity sought on roles and functions with joint processing, thresholds etc. expectations around processing. Will need to be managed by both Regional and District Councils. District Councils currently being compelled by GWRC to obtain discharge consents for existing stormwater networks. We need clarity on the "roles" and "responsibilities" of the TA and Regional Council under this proposed change.	Clarifications. Further clarity sought on this Policy.	Reject
S167.077	Taranaki Whānui			S167.077	Taranaki Whānui	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Taranaki Whānui supports the amendments to Policy 14.	Retain as notified.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.038	Rangitāne O Wairarapa Inc			S168.038	Rangitāne O Wairarapa Inc	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>The title of this policy indicates that the provision relates specifically to urban development. However not all elements of the provision are specifically about urban development, and many are relevant to all freshwater decisions, for example see clauses a - e, l - l. If the intention of the policy is that it applies only to urban development, how will these matters be managed for other forms of development? No definition of 'urban development' is provided in the plan change. Restricting the scope of the policy in this way is neither appropriate, efficient or effective, and neither will it give full effect to the NPS FM.</p> <p>If additional provisions will need to be drafted and incorporated into the RPS in the future to address non-urban matters, this will lead to considerable repetition and the likelihood of confusion, inefficiencies, and inconsistencies in approach. A disjointed and confused approach will go against the intended and stated objective of achieving integrated management.</p>	<p>Amend the policy:</p> <p>To improve the grammatical structure, and provide greater clarity and consistency, including in particular clauses a and b;</p> <p>To extend clause (d) to refer to environmental flows, not just target attribute states</p> <p>So that it applies to all use and development, not just 'urban development', in order to efficiently and effectively achieve integrated management.</p>	Accept in part
S168.038	Rangitāne O Wairarapa Inc	FS28.045	Horticulture New Zealand	FS28.045	Horticulture New Zealand	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose in part	There could be unintended consequences of applying policy developed for the urban context to rural development and seek that any such changes were undertaken through a separate process.	<p>Disallow in part</p> <p>Disallow relief in relation to expanding the policy beyond the urban development intent for which these provisions were drafted without further review and s32 analysis.</p>	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.038	Rangitāne O Wairarapa Inc	FS31.148	Sustainable Wairarapa inc	FS31.148	Sustainable Wairarapa inc	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Nga mihi nui Ian Gun		
S169.008	Kahungunu Ki Wairarapa			S169.008	Kahungunu Ki Wairarapa	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S169.008	Kahungunu Ki Wairarapa	FS31.009	Sustainable Wairarapa inc	FS31.009	Sustainable Wairarapa inc	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

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								Nga mihi nui Ian Gun		
S170.029	Te Rūnanga o Toa Rangatira			S170.029	Te Rūnanga o Toa Rangatira	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>Policy 14: Managing contamination in stormwater from development - regional plans</p> <p>It is worthwhile to consider whether this policy could also be included in District Plans, not just the Regional Plans. The word 'manage' is not ideal as it refers to a world that we may never reduce the contamination. It is not appropriate that, with this wording we are required to accept some form of contamination to constantly occur. It is ideal that the policy intent reflects the contamination from stormwater will be phased off because we have rules and provisions in place that we stopped the contamination to reach to our rivers, ocean, and wetlands. New and existing subdivision and development (their regulation mostly covered by District Plan clauses) should not allow paru water reaching to our precious freshwater environments, in which some of them are severely contaminated already.</p>	<p>Require inclusion in Distirct Plans as well as Regional Plans.</p> <p>Replace 'manage' with stronger wording to ensure the contamination of stormwater is phased out.</p> <p>Subdivisions should not be allowed if paru water will reach freshwater environments.</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S170.029	Te Rūnanga o Toa Rangatira	FS29.143	Ngā Hapu o Otaki	FS29.143	Ngā Hapu o Otaki	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S16.049	Kāpiti Coast District Council			S16.049	Kāpiti Coast District Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	<p>It is Council's understanding the justification GWRC is using to base the proposal to require city and district councils to carry out water quality and aquatic ecosystem health functions is the reference in section 31 of the RMA to the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources. This clause does not give city and district councils the power to manage waterbodies and aquatic ecosystem health.</p> <p>Council also notes references in the NPS-FM that could be interpreted to be requiring city and district councils to carry out freshwater management responsibilities, however this is not Council's reading of the NPS-FM.</p> <p>If it is the intent of the NPS-FM to transfer freshwater management responsibilities to city and district councils, and Council does not consider it is, then the RPS needs to be very specific on the responsibilities proposed for city and district councils to achieve this - and such activities and responsibilities must fall within the functions and technical capabilities of city and district councils. City and district councils have no technical expertise on the management of water quality or ecosystem health, and therefore we would expect the section 32 evaluation to identify and explore this issue with respect to the alternative methods that may be the most appropriate, effective and efficient method to achieve the relevant objectives. The section 32 evaluation</p>	<p>Amend Policy 15 to remove the requirement for district plans to manage earthworks and vegetation disturbance to the extent necessary to achieve the target attribute states. Amend Policy 15 to specify and support district plan provisions that have positive impacts on freshwater such as:</p> <ol style="list-style-type: none"> 1. setbacks for vegetation disturbance and earthworks from water bodies. 2. Earthworks sediment management. 3. Subdivision layout and design. 4. Attenuation and hydraulic neutrality. 	Accept in part

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								<p>does not do this.</p> <p>Although Council agrees there are functions city and district councils have in section 31 for the management of activities that can result in adverse effects on water such as earthworks and vegetation removal, we do not agree city and district councils can include regulatory methods in a district plan managing these activities to achieve the target attributes. Council notes the guidance on this matter released by the Ministry for the Environment for territorial local authorities does not support the approach taken by Policy 15 as follows:</p> <p>The NPS-FM 2020 does not provide specific directions about what approaches territorial authorities should use to manage the effects of land use and development on freshwater in district plans. The approach provides flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district1.</p> <p>Council would support the inclusion of provisions in the RPS that support and provide statutory weight for district plan provisions that manage earthworks and vegetation removal that may affect water, but we do not support the requirement for district plans to includewater quality provisions that would need city and district councils to have regional council expertise, and regional council functions under section 30 of the RMA.</p>		

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								Finally, Council notes all the requirements of policy 15 are covered by regional council functions under section 30 of the RMA, meaning GWRC is able to include provisions managing these activities and the effects of these activities in their regional plan(s).		
S16.049	Kāpiti Coast District Council	FS19.021	Wellington Water Ltd ("Wellington Water")	FS19.021	Wellington Water Ltd ("Wellington Water")		Oppose	Doesn't provide sufficient certainty that the effects will be appropriately managed without matters falling into the gaps between councils.	Disallow	Accept in part
S25.023	Carterton District Council			S25.023	Carterton District Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	While CDC supports a more holistic consideration of the effects of earthworks and vegetation clearance, it is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m ²). It is unclear how policies, rules and methods, and subsequent assessment	Remove reference to district plans from this policy, so that the requirements only apply to regional plans.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>of land use consent applications, should be applied in a district plan context. CDC does not have the capacity to undertake an assessment of the matters described in this policy as they do not relate to core territorial authority functions, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks.</p> <p>Policies, rules and methods addressing these matters are more appropriate in a regional plan and therefore CDC requests that references to district plans are removed from this policy.</p>		
S25.023	Carterton District Council	FS19.007	Wellington Water Ltd ("Wellington Water")	FS19.007	Wellington Water Ltd ("Wellington Water")	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	Doesn't provide sufficient certainty that the effects will be appropriately managed without matters falling into the gaps between councils.	Disallow	Accept in part
S25.023	Carterton District Council	FS14.005	Masterton District Council	FS14.005	Masterton District Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support		Not stated Agrees with CDC's decision requested to remove reference to district plans from this policy so that the requirements only apply to regional plans.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.040	Porirua City Council			S30.040	Porirua City Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	<p>It is important that controls in District Plans do not duplicate those in the Regional Plan. Unlike District Plans, Regional Plans can control both land uses and discharges and as such are the primary tool for achieving target attribute states for water bodies.</p> <p>The policy should be split into two policies so it is clear what the Regional Plan should cover and what district plans should cover. Otherwise, it lacks regulatory certainty as district plans do not have the jurisdiction to address everything they are being required to by this policy.</p> <p>The qualifier "to assist" is being sought as regulation can and should be used to assist in achieving target attribute states, but by themselves they can't achieve them.</p> <p>The policy also needs to provide clearer direction as to what providing for mana whenua and their relationship actually means in respect of earthworks and vegetation disturbance. As it is worded, all it does is repeat s6(e) of the RMA and adds no value.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives. It should be split into two policies so it is clear what the Regional Plan should cover and what district plans should cover; and/or reword as follows:</p> <p>Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to minimise the extent necessary to assist in achieving the target attribute states that are set in the Regional Plan 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.</p>	Accept in part
S30.040	Porirua City Council	FS25.073	Peka Peka Farm Limited	FS25.073	Peka Peka Farm Limited	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part

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S32.014	Director-General of Conservation			S32.014	Director-General of Conservation	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	<p>The proposed changes to this policy would leave a timing gap in its effect until target attribute states have been set.</p> <p>They would also mean that as long as the target attribute state is met there would be no requirement to minimise erosion and siltation (ie it would allow deterioration of water quality down to the target attribute state).</p>	Decline the proposed change and retain the operative version of Policy 15, or, Retain the proposed plan change and existing the requirements of the operative version of Policy 15.	Reject
S32.014	Director-General of Conservation	FS10.002	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	FS10.002	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	<p>The Fuel Companies agree that until target attribute states are set there is uncertainty around the implications of the policy. However, any return to the operative version of Policy 15 would need to include reinstatement of those parts of the Explanation that clarify how the term 'minimise' is to be interpreted in this context. Specifically, that minimisation involves reduction of effects to the extent reasonably achievable and that effects cannot always be completely avoided. Any interpretation of the term 'minimise' that required effects to be reduced to the smallest amount possible without enabling consideration of the practicality of doing so in the context of the activity and receiving environment would be opposed.</p>	Allow in part Allow the submission only if the explanatory text relating to the term 'minimise' is reinstated along with the operative version, or components of the operative version of Policy 15.	Reject
S32.014	Director-General of Conservation	FS24.001	Powerco Limited	FS24.001	Powerco Limited	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	<p>Powerco agrees that until target attribute states are set there is uncertainty around the implications of the policy. However, any return to the operative version of Policy 15 would need to include reinstatement of those parts of the Explanation that clarify how the term 'minimise' is to be interpreted in this context. Specifically, that minimisation involves reduction of effects to the</p>	Allow in part Allow the submission only if the explanatory text relating to the term 'minimise' is reinstated along with the operative version, or components of the operative version of Policy 15.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								extent reasonably achievable and that effects cannot always be completely avoided. Any interpretation of the term 'minimise' that required effects to be reduced to the smallest amount possible without enabling consideration of the practicality of doing so in the context of the activity and receiving environment would be opposed.		
S32.014	Director-General of Conservation	FS28.046	Horticulture New Zealand	FS28.046	Horticulture New Zealand	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	HortNZ agree that there is ambiguity in referring to yet to be set target attribute states	Allow in part	Accept in part
S32.014	Director-General of Conservation	FS20.008	Ātiawa ki Whakarongotai Charitable Trust	FS20.008	Ātiawa ki Whakarongotai Charitable Trust	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	<p>As stated in our original submission, the current drafting does not provide strong policy direction, the words 'to the extent necessary' are open to interpretation, and are a soft approach to the management earthworks and vegetation disturbance. Ātiawa has suggested the deletion of those words to ensure target attribute states are achieved and mana whenua values are provided for.</p> <p>Ātiawa recognise there is a timing issue where target attribute states are yet to set, Ātiawa seek to work with council to determine an approach where this is an issue.</p>	<p>Disallow</p> <p>Disallow deleting proposed Policy 15 and retain operative Policy 15. Ātiawa do not support unclear what the threshold would be to decide what version (operative or proposed) of the policy is applied. Also, no timeframe has been provided for when the operative version would expire. this outcome, the operative version of the policy does not provide for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga as provided for by first, Te Tiriti and the RMA. In addition, disallow the Director's other suggestion of maintaining both policies, it is unclear what the threshold would be to decide what version (operative or proposed) of the policy is applied. Also, no timeframe has been</p>	Accept

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									provided for when the operative version would expire.	
S32.014	Director-General of Conservation	FS30.292	Beef + Lamb New Zealand Ltd	FS30.292	Beef + Lamb New Zealand Ltd	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S34.061	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.061	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose in part	<p>Council supports the intent to manage freshwater to provide for mana whenua and their relationship with te taiao. This represents a change in approach that would relate to all vegetation even where vegetation disturbance is a permitted activity on which district plans cannot then impose conditions. Regional council already provide guidance on earthworks management alongside provisions relating to earthworks. Council considers that water quality is a regional council function and the NPS- FM in its guidance identifies "flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district"</p> <p>We consider that the measures the policy is now trying to manage, is outside the scope territorial authority. Council notes that some forms of vegetation disturbance (such as trimming) do not alter the ground conditions.</p>	<p>Amend so that this applies to regional plans only or to identify measures over which territorial authorities have control.</p> <p>Amend to read:</p> <p>"Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance removal to..."</p> <p>If necessary, add a specific district plan policy related to erosion and sediment run-off from small scale earthworks in urban areas.</p>	Accept in part
S79.029	South Wairarapa District Council			S79.029	South Wairarapa District Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose in part	<p>The policy is written in a manner that holds TA's responsible for meeting freshwater targets and limits in regional plans. this is not the function of Territorial Authorities under s.31 of the RMA to manage the use of land to achieve water quality and quantity attribute states. Similarly, this is not within the scope of 3.5(3) of the NPS which looks to 'promote positive effects' and avoid, remedy, mitigate for general health and wellbeing, not to achieve target and limits.</p> <p>TA's contributions to meeting NPS FM is adequately addressed above in the</p>	Remove the requirement in Policy 15 for TA's to manage activities to achieve attribute states.	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>amended Policy 14 and FW.1 as part of GWRC discharge consent decisions and other regional plan matters.</p> <p>Further, much of the activities requires by the policy is managed by not only the regional plan but also the NES F. Duplication where this is required by both TA's and RC's inefficient and doesn't meet s.32.</p> <p>It is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m²).</p> <p>SWDC does not have the capacity to undertake an assessment of the matters described in this policy as they do not relate to core territorial authority functions, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks. Policies, rules and methods addressing these matters are more appropriate in a regional plan.</p>		

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S79.029	South Wairarapa District Council	FS14.027	Masterton District Council	FS14.027	Masterton District Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	<p>Agree with:</p> <p>The policy is written in a manner that holds TA's responsible for meeting freshwater targets and limits in regional plans. this is not the function of Territorial Authorities under s.31 of the RMA to manage the use of land to achieve water quality and quantity attribute states. Similarly, this is not within the scope of 3.5(3) of the NPS which looks to 'promote positive effects' and avoid, remedy, mitigate for general health and wellbeing, not to achieve target and limits.</p> <p>TA's contributions to meeting NPS FM is adequately addressed above in the amended Policy 14 and FW.1 as part of GWRC discharge consent decisions and other regional plan matters.</p> <p>Further, much of the activities requires by the policy is managed by not only the regional plan but also the NES F. Duplication where this is required by both TA's and RC's inefficient and doesn't meet s.32.</p> <p>It is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m²).</p> <p>SWDC does not have the capacity to undertake an assessment of the matters described in this policy as they do not relate to core territorial authority functions, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks. Policies,</p>	Not stated	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								rules and methods addressing these matters are more appropriate in a regional plan.		
S115.040	Hutt City Council			S115.040	Hutt City Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	No reasons given	Retain as notified	Reject
S128.026	Horticulture New Zealand			S128.026	Horticulture New Zealand	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	It is noted that the RPS does not include definitions for earthworks or vegetation disturbance - this would assist in providing clarity to the policy.	Retain as notified however consider providing definitions for earthworks or vegetation disturbance.	Accept in part
S128.026	Horticulture New Zealand	FS30.044	Beef + Lamb New Zealand Ltd	FS30.044	Beef + Lamb New Zealand Ltd	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	B+LNZ supports the inclusion of earthworks and vegetation disturbance definitions to assist in the interpretation of regional policies.	Allow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.064	Ātiawa ki Whakarongotai Charitable Trust			S131.064	Ātiawa ki Whakarongotai Charitable Trust	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	<p>Ātiawa supports reference to providing for mana whenua values, and our relationship with our culture, land, water, sites, wāhi tapu and other taonga. Ātiawa supports this consideration to be applied to regional and district plans to ensure that those mana whenua values are provided for in regards to earthworks and vegetation clearance. These two activities can have devastating impacts on mana whenua values when poorly managed. The current drafting does not provide strong policy direction, the words 'to the extent necessary' are open to interpretation, and are a soft approach to the management earthworks and vegetation disturbance. Ātiawa has suggested the deletion of those words to ensure target attribute states are achieved and mana whenua values are provided for.</p>	<p>Amend to:</p> <p>Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to the extent necessary to achieve the target attribute states for water bodies and freshwater ecosystems including the effects of these activities on the lifesupporting 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.</p> <p>The current drafting does not provide strong policy direction, the words 'to the extent necessary' are open to interpretation, and are a soft approach to the management earthworks and vegetation disturbance. Ātiawa has suggested the deletion of those words to ensure target attribute states are achieved and mana whenua values are provided for.</p>	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.064	Ātiawa ki Whakarongotai Charitable Trust	FS29.334	Ngā Hapu o Otaki	FS29.334	Ngā Hapu o Otaki	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S133.008	Muaūpoko Tribal Authority			S133.008	Muaūpoko Tribal Authority	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.	Accept in part
S133.008	Muaūpoko Tribal Authority	FS20.355	Ātiawa ki Whakarongotai Charitable Trust	FS20.355	Ātiawa ki Whakarongotai Charitable Trust	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the	Disallow Disallow the whole submission	Accept in part

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								<p>extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and</p>		

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								mana whenua on the land, as we have undisturbed for over 198 years.		
S140.041	Wellington City Council (WCC)			S140.041	Wellington City Council (WCC)	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	Support as proposed.	Retain as notified.	Reject
S147.053	Wellington Fish and Game Council			S147.053	Wellington Fish and Game Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified	Reject
S147.053	Wellington Fish and Game Council	FS19.117	Wellington Water Ltd ("Wellington Water")	FS19.117	Wellington Water Ltd ("Wellington Water")	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS. Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9. Some of the amendments attempt to address	Disallow	Accept

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								matters that are already adequately covered by extant provisions or PC1 as notified. Some of the amendments undermine the more detailed content of PC1.		
S147.053	Wellington Fish and Game Council	FS30.222	Beef + Lamb New Zealand Ltd	FS30.222	Beef + Lamb New Zealand Ltd	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Accept in part
S158.020	Kāinga Ora Homes and Communities			S158.020	Kāinga Ora Homes and Communities	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	Seeks that this policy is separated into regional plan functions and district plan functions. Considers that the policy could also be redrafted to improve readability by cascading each requirement.	Amend and separate the policy into regional and district plan functions. New policies will need to be created. AND Include cascading points under	Accept in part

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									the chapeau of 'the control of earthworks and vegetation'.	
S158.020	Kāinga Ora Homes and Communities	FS14.0010	Masterton District Council	FS14.0010	Masterton District Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	Agree that further clarification is needed as to Regional Plan functions vs. District Plan functions under Policy 15.	Not stated Agree with the specific point made by Kāinga Ora that the regional and district plan functions need to be separated and amended under the policy.	Accept in part
S163.053	Wairarapa Federated Farmers			S163.053	Wairarapa Federated Farmers	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	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. Refer to submission for more detail.	That the amendments to Policy 15 be deleted.	Reject
S163.053	Wairarapa Federated Farmers	FS28.047	Horticulture New Zealand	FS28.047	Horticulture New Zealand	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	HortNZ agree that there is ambiguity in referring to yet to be set target attribute states	Allow	Reject
S163.053	Wairarapa Federated Farmers	FS7.096	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.096	Royal Forest and Bird Protection Society (Forest & Bird)	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month,	Disallow Disallow whole submission	Accept in part

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								and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.		
S163.053	Wairarapa Federated Farmers	FS20.218	Ātiawa ki Whakarongotai Charitable Trust	FS20.218	Ātiawa ki Whakarongotai Charitable Trust	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
S163.053	Wairarapa Federated Farmers	FS29.069	Ngā Hapu o Otaki	FS29.069	Ngā Hapu o Otaki	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented. Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy'	Not stated	Accept in part

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								aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.		
S163.053	Wairarapa Federated Farmers	FS30.125	Beef + Lamb New Zealand Ltd	FS30.125	Beef + Lamb New Zealand Ltd	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Reject
S165.050	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.050	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	<p>Further components are required to ensure this policy is:</p> <ul style="list-style-type: none"> a. in accordance with s6(a) and (c) of the RMA, b. gives effect to NPSFM Policies 6 and 7, and c. gives effect to NZCPS Objective 1 and Policies 11, 13, and 14. <p>Amendments required for clarity and to ensure no further wetland loss, the protection of rivers and their margins. Sedimentation generated on land affects estuaries and harbours and these environments are not provided the same protection under the NPSFM as inland water bodies. A bespoke policy directing a reduction in sedimentation affecting estuaries and harbours is required.</p>	<p>Amend as follows:</p> <p>Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to minimise the extent necessary in order to achieve the target attribute states for water bodies and freshwater ecosystems, including the effects of these avoid adverse effects generated by these activities on the life-supporting capacity of soils, wetlands, rivers and their margins, and to provide for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</p> <p>Include additional policy:(x)</p>	Accept in part

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									reduce sedimentation rates in the region's estuaries and harbours;	
S165.050	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS28.048	Horticulture New Zealand	FS28.048	Horticulture New Zealand	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	An 'avoid' adverse effects direction is too absolute in this policy context	Disallow Disallow amendment sought to Policy 15	Accept in part
S165.050	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the	Disallow	Accept in part

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								inefficient implementation and confusion amongst those who it impacts materially.		
S166.027	Masterton District Council			S166.027	Masterton District Council	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose in part	<p>Policy asks TAs to manage earthworks and vegetation disturbance to achieve target attribute states.</p> <p>Understand under NPS-FM environmental bottom lines are required, but this Policy goes as far as to manage earthworks for driveways and retaining walls.</p>	Provide further clarifications to address the relief sought in the submission	Accept in part
S167.078	Taranaki Whānui			S167.078	Taranaki Whānui	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	Taranaki Whānui supports the amendments to Policy 15. We note mana whenua values have been provided for and that target attribute states must be achieved.	Retain as notified.	Reject
S168.039	Rangitāne O Wairarapa Inc			S168.039	Rangitāne O Wairarapa Inc	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	Rangitāne o Wairarapa support the content of this provision but, as a whole, the policy doesn't make grammatical sense. One way to improve clarity would be to split the matters into several distinct clauses.	Reword the provision to provide greater clarity and improve the grammatical structure of the policy	Accept in part

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S168.039	Rangitāne O Wairarapa Inc	FS31.149	Sustainable Wairarapa inc	FS31.149	Sustainable Wairarapa inc	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

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								Nga mihi nui Ilan Gun		
S168.040	Rangitāne O Wairarapa Inc			S168.040	Rangitāne O Wairarapa Inc	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	It is unclear why the life supporting capacity of soil is a freshwater matter.	Provide better clarity in the policy on the relationship of the life-supporting capacity of soil to achieving freshwater outcomes.	Accept in part
S168.040	Rangitāne O Wairarapa Inc	FS31.150	Sustainable Wairarapa inc	FS31.150	Sustainable Wairarapa inc	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period	Not stated	Accept in part

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								<p>to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S170.030	Te Rūnanga o Toa Rangatira			S170.030	Te Rūnanga o Toa Rangatira	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	By using the word 'managing' we are accepting and acknowledging the effects of earthworks and vegetation disturbance instead of avoiding these activities to achieve the target attribute states for water bodies and freshwater ecosystems.	Change the word "Managing" in the policy to avoid.	Reject

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S170.030	Te Rūnanga o Toa Rangatira	FS29.144	Ngā Hapu o Otaki	FS29.144	Ngā Hapu o Otaki	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.		
S11.008	Outdoor Bliss Heather Blissett			S11.008	Outdoor Bliss Heather Blissett	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Health of the river comes first	Amend as follows: Take and use of water for the health needs of the river first and then people	Reject
S30.041	Porirua City Council			S30.041	Porirua City Council	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Council supports the inclusion of marae.	Retain as notified.	Accept in part
S30.041	Porirua City Council	FS25.074	Peka Peka Farm Limited	FS25.074	Peka Peka Farm Limited	Policy 17: Take and use of water for the health needs of people - regional plans	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary	Allow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								submission or this further submission by Peka Peka Farm Ltd.		
S32.015	Director-General of Conservation			S32.015	Director-General of Conservation	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	The proposed change would have the effect of treating any and all community or public water supply, including for industrial and farming use, as being for health needs of people. This is inconsistent with Te Mana o te Wai, which provides for industrial and farming use of water in the third priority.	Amend the proposed Policy as follows or words to like effect: "...The health needs of people include the drinking water component of: The taking of water by any..."	Accept in part
S32.015	Director-General of Conservation	FS19.013	Wellington Water Ltd ("Wellington Water")	FS19.013	Wellington Water Ltd ("Wellington Water")	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	Not appropriate for management of the water in community supplies.	Disallow	Accept in part
S32.015	Director-General of Conservation	FS20.009	Ātiawa ki Whakarongotai Charitable Trust	FS20.009	Ātiawa ki Whakarongotai Charitable Trust	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Ātiawa acknowledge the real concern set out by the Director General of Conservation, that industry and agriculture are actively seeking to be included under the second priority (of the hierarchy of obligation). Ātiawa support provisions that enforce the hierarchy of obligations. As it is drafted Policy 17 and the explanation provide clear guidance on how the policy is to be interpreted, in particular, that any take and use of water must be for the health needs of people.	Allow in part Allow in part, in so far as clarifying the provisions enforces the intent of the hierarchy of obligations as set out in the NPS-FM, particularly that health needs of people directs takes and use to be for uses such as drinking water.	Accept in part
S32.015	Director-General of Conservation	FS30.293	Beef + Lamb New Zealand Ltd	FS30.293	Beef + Lamb New Zealand Ltd	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of	Disallow	Accept in part

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								the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S79.030	South Wairarapa District Council			S79.030	South Wairarapa District Council	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Support the prominence of the health needs of people.	Retain as notified	Accept in part
S102.046	Te Tumu Paeroa Office of the Māori Trustee			S102.046	Te Tumu Paeroa Office of the Māori Trustee	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Supports Policy 17 and its implementation through regional plans, and the review of water allocation plans. However, considers that "papakāinga" should be added to point (d), to ensure water can be provided.	Amend Policy 17 clause (d) to read: (d) the taking of water for marae and papakāinga .	Accept
S102.046	Te Tumu Paeroa Office of the Māori Trustee	FS6.003	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	FS6.003	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Policy 17: Take and use of water for the health needs of people - regional plans	Support	We support this submission because papakāinga should be considered in the take and use of water for the health needs of people.	Allow	Accept
S115.041	Hutt City Council			S115.041	Hutt City Council	Policy 17: Take and use of water for the health needs	Support	No reasons given	Retain as notified	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						of people - regional plans				
S128.027	Horticulture New Zealand			S128.027	Horticulture New Zealand	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	<p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p> <p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p>	Amend as follows: Regional plans shall in managing take and use of water and discharges to freshwater include policies, rules and/or methods that prioritises the health and wellbeing of the waterbody and freshwater ecosystems first, and then prioritises any take and use of water for the health needs of people.	Reject
S128.027	Horticulture New Zealand	FS20.021	Ātiawa ki Whakarongotai Charitable Trust	FS20.021	Ātiawa ki Whakarongotai Charitable Trust	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	<p>Ātiawa oppose the submission point. Ātiawa support the notified version of Policy 17. The relief sought does not accurately reflect the intent of hierarchy of obligations - the first being, the health and well-being of water bodies and freshwater ecosystems. This priority is paramount and must be upheld, before resource decision-makers and user begin to consider water takes. The relief sought softens this approach, this is contrary to the legislation.</p>	Disallow	Accept
S128.028	Horticulture New Zealand			S128.028	Horticulture New Zealand	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	<p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p> <p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, seek greater clarity and amendment to this policy both in the</p>	Amend as follows: The health needs of people include: (a) the taking of water by any statutory authority that has a duty for public water supply under any Act of Parliament for drinking water or other essential health need;	Accept in part

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								way in which it directs regional plans, and the health needs of people.	(b) the taking of water for reticulation into a public water supply network for drinking water or other essential health need ; (c) the taking of water for community drinking water supplies; and	
S128.029	Horticulture New Zealand			S128.029	Horticulture New Zealand	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people. In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.	New subclause to be added.(e) food production that contributes to domestic food supply.	Reject
S128.029	Horticulture New Zealand	FS20.022	Ātiawa ki Whakarongotai Charitable Trust	FS20.022	Ātiawa ki Whakarongotai Charitable Trust	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	Ātiawa oppose the relief sought by the submitter. Domestic food production is provided for under the third priority of the hierarchy of obligations. It would inappropriate and contrary to the national legislation for regional council to accept this submission point.	Disallow	Accept
S131.065	Ātiawa ki Whakarongotai Charitable Trust			S131.065	Ātiawa ki Whakarongotai Charitable Trust	Policy 17: Take and use of water for the health needs of people - regional plans	Support	In principle Ātiawa supports the amendments to Policy 17 which provides for the of obligations to be applied to water takes. Ātiawa also supports the inclusion of subclause (d) to include the taking of water for marae as part of the health needs of people. Ātiawa is keen to understand how this policy will be applied to current water permits, especially where catchments are over-allocated or nearing overallocation. Water	Retain as notified.	Accept in part

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								rights (including permits) are a significant issue for Ātiawa		
S131.065	Ātiawa ki Whakarongotai Charitable Trust	FS29.335	Ngā Hapu o Otaki	FS29.335	Ngā Hapu o Otaki	Policy 17: Take and use of water for the health needs of people - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater,</p>	Not stated	Accept in part

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								indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S133.009	Muaūpoko Tribal Authority			S133.009	Muaūpoko Tribal Authority	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.	Accept in part

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S133.009	Muaūpoko Tribal Authority	FS20.356	Ātiawa ki Whakarongotai Charitable Trust	FS20.356	Ātiawa ki Whakarongotai Charitable Trust	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	<p>Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from</p>	<p>Disallow</p> <p>Disallow the whole submission</p>	Accept in part

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								the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.		
S140.042	Wellington City Council (WCC)			S140.042	Wellington City Council (WCC)	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Support as proposed.	Retain as notified.	Accept in part
S144.038	Sustainable Wairarapa Inc			S144.038	Sustainable Wairarapa Inc	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Needed in order to give effect to the NPS for FM	Retain as notified.	Accept in part
S147.054	Wellington Fish and Game Council			S147.054	Wellington Fish and Game Council	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified	Accept in part
S147.054	Wellington Fish and Game Council	FS19.118	Wellington Water Ltd ("Wellington Water")	FS19.118	Wellington Water Ltd ("Wellington Water")	Policy 17: Take and use of water for the health needs	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS. Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not	Disallow	Accept in part

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						of people - regional plans		accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9. Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified. Some of the amendments undermine the more detailed content of PC1.		
S147.054	Wellington Fish and Game Council	FS30.223	Beef + Lamb New Zealand Ltd	FS30.223	Beef + Lamb New Zealand Ltd	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Accept in part
S163.054	Wairarapa Federated Farmers			S163.054	Wairarapa Federated Farmers	Policy 17: Take and use of water for the health needs	Oppose	Defer to full review of the RPS in 2024. The health needs of people (drinking	That the amendments to Policy 17 be deleted	Reject

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						of people - regional plans		water and basic sanitation) are only a portion of municipal takes: as currently written, the policy implies all takings of water by statutory authorities.		
S163.054	Wairarapa Federated Farmers	FS28.049	Horticulture New Zealand	FS28.049	Horticulture New Zealand	Policy 17: Take and use of water for the health needs of people - regional plans	Support	As an alternative relief to that sought in HortNZ's submission, would be to defer the amendment of this provision until a full review in 2024	Allow Allow should the review of freshwater provisions be deferred to 2024	Reject
S163.054	Wairarapa Federated Farmers	FS7.097	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.097	Royal Forest and Bird Protection Society (Forest & Bird)	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept in part
S163.054	Wairarapa Federated Farmers	FS20.219	Ātiawa ki Whakarongotai Charitable Trust	FS20.219	Ātiawa ki Whakarongotai Charitable Trust	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part

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S163.054	Wairarapa Federated Farmers	FS29.070	Ngā Hapu o Otaki	FS29.070	Ngā Hapu o Otaki	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated	Accept in part
S163.054	Wairarapa Federated Farmers	FS30.126	Beef + Lamb New Zealand Ltd	FS30.126	Beef + Lamb New Zealand Ltd	Policy 17: Take and use of water for the health needs of people - regional plans	Support	<p>B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.</p>	Allow	Reject

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S165.051	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.051	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Reference to "community supplies" is vague and must be qualified. Otherwise, it could suggest water for third order priorities (i.e. social, economic and cultural wellbeing) is captured.	Amend (c) as follows: (c) the taking of water for community drinking water supplies; and	Accept in part
S165.051	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept in part
S166.028	Masterton District Council			S166.028	Masterton District Council	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Agree that the Regional Rules need to allow for the health needs of people - but acknowledge that economic and cultural needs should be considered.	Retain as notified. However: Consider the inclusion of economic and cultural needs as well, even if it is in prioritised criteria.	Accept in part

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S167.079	Taranaki Whānui			S167.079	Taranaki Whānui	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Taranaki Whānui supports the amendments to Policy 17 noting that the first priority is given to the health and wellbeing of the waterbody.	Retain as notified.	Accept in part
S168.041	Rangitāne O Wairarapa Inc			S168.041	Rangitāne O Wairarapa Inc	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	<p>While the explanation for this policy states that the policy prioritises health needs of people before other uses of water, the provision doesn't currently do that and is very broadly phrased.</p> <p>Rangitāne o Wairarapa considers that the only water takes that should have second priority under Te Mana o te Wai are water takes for drinking water and sanitation. The taking of water for 'public water supply' or 'community supplies' should be limited to the volume necessary for those purposes, and not for other uses such as irrigation or industrial use.</p> <p>It is also important that the list of health needs for water takes in this policy is an exclusive list, not an inclusive list. As it is currently drafted, other uses will be able to argue that they are 'health needs'.</p> <p>As currently drafted, the focus of this policy is on water 'takes'. Other health needs, in particular the cultural and spiritual health needs of Māori, do not require 'taking' water (for example use of water for baptism or birthing). Instead they require that sufficient water is left in waterbodies and that this water is healthy from a spiritual and cultural perspective. These health needs are currently</p>	<p>Amend the policy:</p> <p>So that the only second priority water takes are for drinking water and sanitation only, and then only as these are needed the health needs of people.</p> <p>Amend so that other uses of a public or community supply fall within the third priority, for water takes (in accordance with Te Mana o te Wai).</p> <p>Clarify the list of second priority water takes ("health needs of people") so this is an exclusive list, not an inclusive one.</p> <p>Make provision for the cultural and spiritual health needs of tangata whenua, which require that sufficient water remains within waterbodies that is spiritually and culturally healthy.</p>	Accept in part

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								missing from the policy and should be included.		
S168.041	Rangitāne O Wairarapa Inc	FS19.031	Wellington Water Ltd ("Wellington Water")	FS19.031	Wellington Water Ltd ("Wellington Water")	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	Not appropriate for management of the water in community supplies.	Disallow	Accept in part
S168.041	Rangitāne O Wairarapa Inc	FS31.151	Sustainable Wairarapa inc	FS31.151	Sustainable Wairarapa inc	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.042	Rangitāne O Wairarapa Inc			S168.042	Rangitāne O Wairarapa Inc	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	The taking of water for marae as a health need is supported.	Retain the taking of water for marae as a health need.	Accept
S168.042	Rangitāne O Wairarapa Inc	FS31.152	Sustainable Wairarapa inc	FS31.152	Sustainable Wairarapa inc	Policy 17: Take and use of water for the health needs of people - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most</p>	Not stated	Accept

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								<p>members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S170.031	Te Rūnanga o Toa Rangatira			S170.031	Te Rūnanga o Toa Rangatira	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	<p>This policy contradicts Te Ao Māori view that humans do not sit at the centre of Taiao and take and use of water is just for health needs of the people. The policy detail that says 'providing for the health and wellbeing of water bodies and freshwater ecosystems' in a way covers this view but also contradictorily says the 'health needs of people ahead of any take and use</p>	Amend the provision to address the contradictions outlined.	Reject

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								for other purposes while providing for...'		
S170.031	Te Rūnanga o Toa Rangatira	FS29.145	Ngā Hapu o Otaki	FS29.145	Ngā Hapu o Otaki	Policy 17: Take and use of water for the health needs of people - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p>	Not stated	Reject

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								<p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		
S16.050	Kāpiti Coast District Council			S16.050	Kāpiti Coast District Council	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Council supports the proposed amendments to the policy. We consider the proposed amendments are consistent with regional council functions under section 30 of the RMA and give effect to the NPS-FM.	Retain	Accept in part
S20.002	Mangaroa Peatland Focus Group_Paul Dyson			S20.002	Mangaroa Peatland Focus Group_Paul Dyson	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's</p>	Delete the phrase "and their restoration is promoted".	Reject

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								<p>as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>		
S21.002	Mangaroa Peatland Focus Group_Liorah Atkinson			S21.002	Mangaroa Peatland Focus Group_Liorah Atkinson	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S23.002	Mangaroa Peatland Focus Group_Ian Spendlove			S23.002	Mangaroa Peatland Focus Group_Ian Spendlove	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS</p>	Delete the phrase "and their restoration is promoted".	Reject

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								should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.		
S26.002	Mangaroa Peatland Focus Group_Andrea Follett			S26.002	Mangaroa Peatland Focus Group_Andrea Follett	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted"	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.042	Porirua City Council			S30.042	Porirua City Council	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>These are very strong policy directions that go beyond and are stricter than what is in the NPS-FM. There are no exceptions here, and no hierarchy provided for when directions are not practicable.</p> <p>Some clauses unnecessarily duplicate directions in the NPS-FM without providing additional direction in a regional context, they also duplicate other policy directions in this RPS including policy 14.</p> <p>Several clauses have a different construct to the rest of the clauses and don't flow from "including" in the chapeau</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows:</p> <p>Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of waterbodies, including:</p> <p>(a) managing freshwater in a way that gives effect to <i>Te Mana o te Wai</i>;</p> <p>(b) actively involve mana whenua / tangata whenua in freshwater management (including decision-making processes), and</p> <p>(c) identify and provide for Māori freshwater values are identified and provided for;</p> <p>(d) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their <i>restoration</i> is promoted;</p> <p>(e) achieving environmental outcomes, target attribute states and environmental flows and levels;</p> <p>(f) avoiding the loss of river extent and values;</p> <p>(g) protecting the significant values of outstanding waterbodies;</p> <p>(h) protecting the habitats of indigenous freshwater species are protected;</p> <p>(i) Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;</p> <p>(j) promoting the</p>	Accept in part

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									<p>retention of in-stream habitat diversity by retaining natural features - such as pools, runs, riffles, and the river's natural form;</p> <p>(k) promoting the retention of natural flow regimes - such as flushing flows;</p> <p>(l) promoting the protection and reinstatement of riparian habitat;</p> <p>(m) promoting the installation of off-line water storage;</p> <p>(n) measuring and evaluating water takes;</p> <p>(o) restricting the reclamation, piping, straightening or concrete lining of rivers;</p> <p>(p) discourage restricting stock access to estuaries, rivers, lakes and wetland;</p> <p>(q) restricting the diversion of water into or from wetlands -unless the diversion is necessary to restore the hydrological variation to the wetland;</p> <p>(r) restricting the removal or destruction of indigenous plants in</p> <p>(s) restoring and maintaining fish passage</p>	
S30.042	Porirua City Council	FS25.075	Peka Peka Farm Limited	FS25.075	Peka Peka Farm Limited	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part

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S31.018	Robert Anker			S31.018	Robert Anker	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	Consider that the phrase " and their restoration is promoted" should be deleted from the RPS.	Amend clause (c) to read: (c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;	Reject
S32.016	Director-General of Conservation			S32.016	Director-General of Conservation	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended. Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted. Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.	Retain as notified except for the following changes: "(b) actively involve mana whenua / tangata whenua in freshwater management (including decision-making processes), and identify and provide for Māori freshwater values are identified and provided for;"...	Accept in part
S32.016	Director-General of Conservation	FS20.0010	Ātiawa ki Whakarongotai Charitable Trust	FS20.0010	Ātiawa ki Whakarongotai Charitable Trust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	It is not clear from the Director's explanation the reason why these changes are requested. It is difficult to follow how the changes requested by the Director would have any difference in effect, the reasoning provided talks about the appropriateness of "restricting" activities, and then the decision sought seeks to the wording of the policy that provides for Māori freshwater values. Which is not related to "restricting" activities. Ātiawa do not support this rationale, it is not appropriate for the Director	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								General of Conservation to seek to change the effect of Māori freshwater values through this process.		
S32.016	Director-General of Conservation	FS30.294	Beef + Lamb New Zealand Ltd	FS30.294	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept in part
S32.027	Director-General of Conservation			S32.027	Director-General of Conservation	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended. Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent	"(g)protecting the habitats of indigenous freshwater species are protected;"...	Accept

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								<p>with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.</p> <p>Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.</p>		
S32.027	Director-General of Conservation	FS20.018	Ātiawa ki Whakarongotai Charitable Trust	FS20.018	Ātiawa ki Whakarongotai Charitable Trust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	The Director has identified a minor error, Ātiawa support the correction of this clause.	Allow	Accept
S32.027	Director-General of Conservation	FS30.305	Beef + Lamb New Zealand Ltd	FS30.305	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and	Disallow	Reject

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								confusion amongst those who it impacts materially.		
S32.030	Director-General of Conservation			S32.030	Director-General of Conservation	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended.</p> <p>Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.</p> <p>Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.</p>	"(h)ensuring that freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;...	Reject
S32.030	Director-General of Conservation	FS30.308	Beef + Lamb New Zealand Ltd	FS30.308	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary</p>	Disallow	Accept

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								engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S32.031	Director-General of Conservation			S32.031	Director-General of Conservation	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended.</p> <p>Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.</p> <p>Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.</p>	"(r)restoring and maintaining fish passage where appropriate "	Accept
S32.031	Director-General of Conservation	FS3.023	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.023	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Waka Kotahi supports a targeted approach to restoring and maintaining fish passage.	Allow	Accept

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S32.031	Director-General of Conservation	FS30.309	Beef + Lamb New Zealand Ltd	FS30.309	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject
S32.032	Director-General of Conservation			S32.032	Director-General of Conservation	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended. Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.	Replacing the word "restricting" in subclauses (n) - (q) with the word "minimising".	Reject

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								Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.		
S32.032	Director-General of Conservation	FS30.310	Beef + Lamb New Zealand Ltd	FS30.310	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept
S33.002	Mangaroa Peatland Focus Group_Sandy, Judith, Kauika-Stevens			S33.002	Mangaroa Peatland Focus Group_Sandy, Judith, Kauika-Stevens	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's	Delete the phrase "and their restoration is promoted"	Reject

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								<p>as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>		
S34.065	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.065	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	In regard to clause (c), Council recommends caution around how the extent of natural inland wetlands is determined and defined, and to ensure that this is consistent with the NES-F 2020.	Retain policy as notified.	Accept in part
S38.002	Mangaroa Peatland Focus Group_Heather McKay			S38.002	Mangaroa Peatland Focus Group_Heather McKay	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject

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S39.002	Mangaroa Peatland Focus Group_Colin Hawes			S39.002	Mangaroa Peatland Focus Group_Colin Hawes	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S40.002	Mangaroa Peatland Focus Group_Lauritz & Julie Rust			S40.002	Mangaroa Peatland Focus Group_Lauritz & Julie Rust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S41.002	Mangaroa Peatland Focus Group_Andrew Ayrton & Carol Reeves			S41.002	Mangaroa Peatland Focus Group_Andrew Ayrton & Carol Reeves	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S42.002	Mangaroa Peatland Focus Group_Gregor & Stephanie Kempt			S42.002	Mangaroa Peatland Focus Group_Gregor & Stephanie Kempt	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S43.002	Mangaroa Peatland Focus Group_Carol Dormer			S43.002	Mangaroa Peatland Focus Group_Carol Dormer	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S44.002	Mangaroa Peatland Focus Group_Richard Dormer			S44.002	Mangaroa Peatland Focus Group_Richard Dormer	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S45.002	Mangaroa Peatland Focus Group_Weston Hill			S45.002	Mangaroa Peatland Focus Group_Weston Hill	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S46.002	Mangaroa Peatland Focus Group_Lynne Hill			S46.002	Mangaroa Peatland Focus Group_Lynne Hill	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S47.002	Mangaroa Peatland Focus Group_Norman Hill			S47.002	Mangaroa Peatland Focus Group_Norman Hill	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S48.002	Mangaroa Peatland Focus Group_Duncan Carmichael			S48.002	Mangaroa Peatland Focus Group_Duncan Carmichael	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S52.003	Gerald Keown _Mangaroa Peatland Focus Group			S52.003	Gerald Keown _Mangaroa Peatland Focus Group	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S52.003	Gerald Keown _Mangaroa Peatland Focus Group	FS5.2	Brendan Herder	FS5.2	Brendan Herder	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	This amendment to remove the words "and their restoration is promoted" should be allowed. The concept of restoration (including to what prior state) is not sufficiently defined and GWRC has previously failed to appropriately identify the extent of existing natural wetlands, as demonstrated in the findings of the Environment Court in GWRC v Adams (Decision 025 2022).	Allow	Reject
S54.002	Mangaroa Peatland Focus Group_Helen Masters			S54.002	Mangaroa Peatland Focus Group_Helen Masters	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS</p>	Delete the phrase "and their restoration is promoted".	Reject

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								should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.		
S55.002	Mangaroa Peatland Focus Group_Matthew Scrimshaw			S55.002	Mangaroa Peatland Focus Group_Matthew Scrimshaw	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S57.003	Colleen Munro _Mangaroa Peatland Focus Group			S57.003	Colleen Munro _Mangaroa Peatland Focus Group	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject</p>	Delete the phrase "and their restoration is promoted".	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								to that decision was not and is not a natural wetland.		
S58.003	Grant Munro _Mangaroa Peatland Focus Group			S58.003	Grant Munro _Mangaroa Peatland Focus Group	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S58.003	Grant Munro _Mangaroa Peatland Focus Group	FS7.002	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.002	Royal Forest and Bird Protection Society (Forest & Bird)	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	The amendment sought fails to give effect to Policy 6 of the NPS-FM 2020	Disallow Disallow whole submission point.	Accept
S59.002	Mangaroa Peatland Focus Group_Sandra & Mat Gerrard			S59.002	Mangaroa Peatland Focus Group_Sandra & Mat Gerrard	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing</p>	Delete the phrase "and their restoration is promoted".	Reject

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								<p>which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>		
S62.018	Philip Clegg			S62.018	Philip Clegg	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Supports protecting Aotearoa's remaining natural wetlands, however concern about a policy that requires the restoration of all wetlands. This is because the definition of restoration is inadequately defined and requires restoration to an unspecified prior state.</p>	Either make the restoration of wetlands a non-regulatory method; or Amend the policy so the requirement to restore only applies to natural wetlands and notto areas like the peatland that have been so degraded they have ceased to be naturalwetlands.	Reject
S87.002	Roger O'Brien_Mangaroa Peatland Focus Group_			S87.002	Roger O'Brien_Mangaroa Peatland Focus Group_	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject

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S91.002	Mangaroa Peatland Focus Group_Gavin Kirton			S91.002	Mangaroa Peatland Focus Group_Gavin Kirton	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S96.014	Sarah (Dr) Kerkin			S96.014	Sarah (Dr) Kerkin	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Supports protecting Aotearoa's remaining natural wetlands, however concern about a policy that requires the restoration of all wetlands. This is because the definition of restoration is inadequately defined and requires restoration to an unspecified prior state.	Either make the restoration of wetlands a non-regulatory method; or Amend the policy so the requirement to restore only applies to natural wetlands and not to areas like the peatland that have been so degraded they have ceased to be natural wetlands.	Reject
S96.014	Sarah (Dr) Kerkin	FS5.6	Brendan Herder	FS5.6	Brendan Herder	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	6Council should allow this submission to make restoration of wetlands a non-regulatory provision, or be clear that restoration applies only to remaining natural wetlands and not to areas like the historic Mangaroa Peatland that cease to be natural wetlands and are now used for other activities. The concept of restoration (including to what prior state) is not sufficiently defined and GWRC has previously failed to appropriately identify the extent of existing natural wetlands, as demonstrated in the	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								findings of the Environment Court in GWRC v Adams (Decision 025 2022).		
S96.014	Sarah (Dr) Kerkin	FS3.022	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.022	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Waka Kotahi supports a targeted approach to the restoration of wetlands.	Allow	Reject
S97.002	Mangaroa Peatland Focus Group_Nicola Rothwell			S97.002	Mangaroa Peatland Focus Group_Nicola Rothwell	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S101.002	Mangaroa Peatland Focus Group_Madeline Keown			S101.002	Mangaroa Peatland Focus Group_Madeline Keown	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS</p>	Delete the phrase "and their restoration is promoted".	Reject

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								should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.		
S103.002	Mangaroa Peatland Focus Group_Stacey Jack-Kino			S103.002	Mangaroa Peatland Focus Group_Stacey Jack-Kino	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S104.002	Hamish McDonald_Mangaroa Peatland Focus Group			S104.002	Hamish McDonald_Mangaroa Peatland Focus Group	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject</p>	Delete the phrase "and their restoration is promoted".	Reject

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								to that decision was not and is not a natural wetland.		
S105.002	Sharlene McDonald_Mangaroa Peatland Focus Group			S105.002	Sharlene McDonald_Mangaroa Peatland Focus Group	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S107.003	Lisa Keown _Mangaroa Peatland Focus Group			S107.003	Lisa Keown _Mangaroa Peatland Focus Group	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject</p>	Delete the phrase "and their restoration is promoted".	Reject

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								to that decision was not and is not a natural wetland.		
S108.002	Mangaroa Peatland Focus Group_Kerry Ryan			S108.002	Mangaroa Peatland Focus Group_Kerry Ryan	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S109.002	Mangaroa Peatland Focus Group_Christine withey			S109.002	Mangaroa Peatland Focus Group_Christine withey	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject</p>	Delete the phrase "and their restoration is promoted".	Reject

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								to that decision was not and is not a natural wetland.		
S110.002	Mangaroa Peatland Focus Group_John Ryan			S110.002	Mangaroa Peatland Focus Group_John Ryan	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S111.002	Mangaroa Peatland Focus Group_Sheila Ryan			S111.002	Mangaroa Peatland Focus Group_Sheila Ryan	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject</p>	Delete the phrase "and their restoration is promoted".	Reject

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								to that decision was not and is not a natural wetland.		
S112.002	Mangaroa Peatland Focus Group_Russell Flood-Smith			S112.002	Mangaroa Peatland Focus Group_Russell Flood-Smith	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S113.021	Wellington Water			S113.021	Wellington Water	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Clause (c) should be deleted because 3.22 and 3.24 of the NPS-FM set out a reasonably long list of specific exceptions to the policy direction - none of which is carried over into Policy 18. This may confuse Regional Plans, as they must give effect to the NPS-FM and the RPS.	Delete subclause(c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;	Reject
S113.022	Wellington Water			S113.022	Wellington Water	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	The intent of clauses (d) and (h) lacks clarity . Efficient allocation of water results in 100% of the water available for allocation being allocated, so a more suitable goal is appropriate, rather than efficient allocation. We agree water should be efficiently used.	Amend subclause (d) take limits for both allocation and minimum flows achieveing environmental outcomes, target attribute states and environmental flows and levels with appropriate variability;	Reject

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S113.023	Wellington Water			S113.023	Wellington Water	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	The intent of clauses (d) and (h) lacks clarity . Efficient allocation of water results in 100% of the water available for allocation being allocated, so a more suitable goal is appropriate, rather than efficient allocation. We agree water should be efficiently used.	Amend subclause:(h) freshwater is appropriately allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided	Reject
S115.042	Hutt City Council			S115.042	Hutt City Council	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	No reasons given	Retain as notified	Accept in part
S121.002	Mangaroa Peatland Focus Group_Shane Stratford			S121.002	Mangaroa Peatland Focus Group_Shane Stratford	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S122.002	Mangaroa Peatland Focus Group_Jaime Walsh			S122.002	Mangaroa Peatland Focus Group_Jaime Walsh	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's</p>	Delete the phrase "and their restoration is promoted".	Reject

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								<p>as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>		
S128.030	Horticulture New Zealand			S128.030	Horticulture New Zealand	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Many clauses reflect the NPSFM 2020 direction - e.g. clauses (a), (f), (g), (h). Where the references differ, or are framed differently, this may create interpretation issues.</p> <p>While clause (c) reflects Policy of the NPSFM (in respect of natural inland wetlands), how does this interface with the exclusions/exemptions provided for under the NPSFM? It is also noted that whether the NPSFM was intended to, or will apply to coastal wetlands is still subject to change.</p>	<p>Amend as follows:</p> <p>(c) as required to give effect to the NPSFM 2020, there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</p> <p>(d) as required to give effect to the NPSFM 2020, achieving environmental outcomes, target attribute states and environmental flows and levels;</p> <p>(e) as required to give effect to the NPSFM 2020, avoiding the loss of river extent and values;</p> <p>(f) as required to give effect to the NPSFM 2020, protecting the significant values of outstanding water bodies;</p> <p>(g) as required to give effect to the NPSFM 2020, protecting the habitats of indigenous freshwater species are protected;</p> <p>(h) as required to give effect to the NPSFM 2020, Freshwater is</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;	
S128.031	Horticulture New Zealand			S128.031	Horticulture New Zealand	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	There is a grammatical error in clause (g), where protecting and protected are duplicated.	Amend as follows: (g) protecting the habitats of indigenous freshwater species are protected;	Accept
S128.032	Horticulture New Zealand			S128.032	Horticulture New Zealand	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Clause (e) more stringent than Policy 7 NPSFM of the RMA which reads "The loss of river extent and values is avoided to the extent practicable." The proposed change is missing 'to the extent practicable' - it is unclear why/whether this is intentional.	Amend as follows: (e) avoiding the loss of river extent and values to the extent practicable ;	Accept
S128.032	Horticulture New Zealand	FS3.024	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.024	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Waka Kotahi supports the implementation of the NPS FM.	Allow	Accept
S128.033	Horticulture New Zealand			S128.033	Horticulture New Zealand	Policy 18: Protecting and restoring ecological health of	Support in part	Support promoting storage in (l), however seek this applies to water storage broadly.	Amend as follows: (l) Promoting the installation of off-line water storage.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						water bodies - regional plans				
S128.033	Horticulture New Zealand	FS9.011	Wairarapa Water Users Society	FS9.011	Wairarapa Water Users Society	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	All forms of water storage should be supported in both urban and rural environments including in-channel and at all sizes. The consenting process should be used to limit developments from having excessive negative effects. At the level of the RPS, all options should be on the table to mitigate Climate Change and produce food for human consumption.	Not stated As requested by Horticulture NZ	Reject
S128.033	Horticulture New Zealand	FS21.011	Irrigation NZ	FS21.011	Irrigation NZ	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	All forms of water storage should be supported in both urban and rural environments including in-channel and at all sizes. The consenting process should be used to limit developments from having excessive negative effects. At the level of the RPS, all options should be on the table to mitigate Climate Change and produce food for human consumption.	Not stated As requested by Horticulture NZ	Reject
S131.066	Ātiawa ki Whakarongotai Charitable Trust			S131.066	Ātiawa ki Whakarongotai Charitable Trust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Ātiawa supports the amendments to Policy 18 which introduce stronger controls to protect and restore the ecological health of water bodies. In particular, Ātiawa supports inclusion of subclause (a) and (b) which provide for Te Mana o te Wai and mana whenua involvement (including at decisionmaking) as well Māori freshwater values. Ātiawa seek that an integrated approach, ki uta ki tai also be included in the list of subclauses. It cannot be understated that understanding and managing the natural environment, particularly ecological health of water bodies is integral to achieving improves to	Include new subclauses: (bb) Adopt an integrated approach, ki uta ki tai, that recognises the interconnectedness of the whole environment to ensure that ecological health of freshwater is managed in an integrated, ecosystem wide approach(bc) Incorporate the use of mātauranga Māori to protect and restore ecological health Amend the following subclauses: (n) restricting avoid the reclamation, piping, straightening or concrete lining of rivers;	Accept in part

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								ecological health. Additionally, Ātiawa seeks reference to mātauranga Māori. Mātauranga Māori should be recognised and provided for as part of this policy, the NPSFM provides for mātauranga Māori to be applied to all freshwater management (including ecological health). Ātiawa seeks that the word 'avoid' replace the word 'restricting' in subclauses (n),(o),(p),(q), to ensure that these activities are avoided in order to protect and restore ecological function. Ātiawa is concerned that the word 'restrict' could allow leniency and allow activities to occur that have adverse outcomes for ecological function.	(o) restricting avoid stock access to estuaries, rivers, lakes and wetland; (p) restricting avoid the diversion of water into or from wetlands - unless the diversion is necessary to restore the hydrological variation to the wetland; (q) restricting avoid the removal or destruction of indigenous plants in wetlands and lakes; and	
S131.066	Ātiawa ki Whakarongotai Charitable Trust	FS19.003	Wellington Water Ltd ("Wellington Water")	FS19.003	Wellington Water Ltd ("Wellington Water")	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Ki uta ki tai approach is appropriate for managing water bodies if it provides for progressive improvement over an appropriate duration.	Allow in part Accept with changes	Accept in part

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S131.066	Ātiawa ki Whakarongotai Charitable Trust	FS29.336	Ngā Hapu o Otaki	FS29.336	Ngā Hapu o Otaki	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept in part

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S133.010	Muaūpoko Tribal Authority			S133.010	Muaūpoko Tribal Authority	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.	Accept in part
S133.010	Muaūpoko Tribal Authority	FS20.357	Ātiawa ki Whakarongotai Charitable Trust	FS20.357	Ātiawa ki Whakarongotai Charitable Trust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in	Disallow Disallow the whole submission	Accept in part

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								<p>our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and</p>		

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								mana whenua on the land, as we have undisturbed for over 198 years.		
S134.010	Powerco Limited			S134.010	Powerco Limited	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over</p>	<p>Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines:</p> <p>"Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of water bodies, including:</p> <p>...(c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</p> <p>....(e) avoiding the loss of river extent and values;</p> <p>...."</p>	Accept in part

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								allocated catchments, despite not affecting the stated outcomes and limits.		
S134.010	Powerco Limited	FS11.009	Fulton Hogan Limited	FS11.009	Fulton Hogan Limited		Support	The submission identifies that clauses (c) and (e) of policy 18 are inconsistent with the direction provided in the NPS-FM. Specifically, they do not recognise the exceptions to clause (c) relating to natural wetlands and that the loss of river extent and values is to be avoided 'to the extent practicable'. These qualifiers are important and need to be represented in the RPS and the submission is supported on this basis.	Allow	Accept in part
S134.010	Powerco Limited	FS27.012	Winstone Aggregates	FS27.012	Winstone Aggregates		Support	Winstone supports the requested approach of ensuring that the RPS is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers, and accurately reflects the intent of the NPS-FM - i.e. that loss of river extent and values is avoided to the extent practicable, rather than the blanket avoidance approach proposed in the Plan Change.	Allow	Accept in part

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S137.005	Greater Wellington Regional Council (GWRC)			S137.005	Greater Wellington Regional Council (GWRC)	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Amendments are required to improve readability.	Amend Policy 18 as follows: ... (c) ensuring there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted; ... (h) ensuring Ffreshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;	Accept in part
S137.005	Greater Wellington Regional Council (GWRC)	FS13.020	Wellington City Council	FS13.020	Wellington City Council	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow	Accept in part
S138.002	Mangaroa Peatland Focus Group_Jody Sinclair & Josh Lowny			S138.002	Mangaroa Peatland Focus Group_Jody Sinclair & Josh Lowny	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject	Delete the phrase "and their restoration is promoted".	Reject

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								to that decision was not and is not a natural wetland.		
S140.043	Wellington City Council (WCC)			S140.043	Wellington City Council (WCC)	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Support as proposed.	Retain as notified.	Accept in part
S144.039	Sustainable Wairarapa Inc			S144.039	Sustainable Wairarapa Inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The net effects of large scale water storage is unlikely to help to protect and restore the ecological health of water bodies.	Amend clause (l) to read: (l) promoting the installation of public water supply or farm scale (or smaller) off-line water storage;	Reject
S146.002	Mangaroa Peatland Focus Group_Alan Rothwell			S146.002	Mangaroa Peatland Focus Group_Alan Rothwell	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".	Reject

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S147.012	Wellington Fish and Game Council			S147.012	Wellington Fish and Game Council	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Strongly support the expansion and redrafting of Policy 18 to give effect to the NPS-FM.</p> <p>However, as drafted the proposed changes to Policy 18 do not give proper effect to :</p> <ul style="list-style-type: none"> • Policy 6 of the NPS-FM, regarding the protection of natural inland wetlands; and • Policy 10 of the NPS-FM, which specifically recognises the need for the protection of the habitats of trout and salmon. <p>The suggested amendments are intended to address this deficiency. The habitat of valued introduced species such as trout and salmon is given specific recognition under s 7(h) the RMA (1991), which carries through to Policy 10 of the NPS-FM. This reflects the fact that the protection of trout and salmon habitats acts as an umbrella to protect the habitats of a wide range of indigenous species due to the biological requirement of salmonids for abundant cool, clean, water with a wide range of natural river forms (such as deep pools, riffles, runs, and backwater eddies). Consistent with this, trout are utilised in the Fish Index of Biotic Integrity as an indicator species for freshwater ecosystem health.</p> <p>The removal of protections for the habitat of these species significantly reduces the ability of regional plans and policies to reduce adverse harm to the environment.</p>	new subclause(ea) ensuring that there is no further loss of natural inland wetlands and their values are protected;	Reject

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S147.012	Wellington Fish and Game Council	FS19.076	Wellington Water Ltd ("Wellington Water")	FS19.076	Wellington Water Ltd ("Wellington Water")	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part
S147.012	Wellington Fish and Game Council	FS30.181	Beef + Lamb New Zealand Ltd	FS30.181	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept in part

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								that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S147.013	Wellington Fish and Game Council			S147.013	Wellington Fish and Game Council	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Trout and salmon is given specific recognition under s 7(h) the RMA (1991), which carries through to Policy 10 of the NPS-FM.</p> <p>This reflects the fact that the protection of trout and salmon habitats acts as an umbrella to protect the habitats of a wide range of indigenous species due to the biological requirement of salmonids for abundant cool, clean, water with a wide range of natural river forms (such as deep pools, riffles, runs, and backwater eddies). Consistent with this, trout are utilised in the Fish Index of Biotic Integrity as an indicator species for freshwater ecosystem health.</p> <p>The removal of protections for the habitat of these species significantly reduces the ability of regional plans and policies to reduce adverse harm to the environment.</p>	Amend. "(g) protecting the habitats of indigenous freshwater species and the habitats of trout and salmon insofar as this is consistent with the protection of the habitats of indigenous freshwater species are protected,;"	Accept in part
S147.013	Wellington Fish and Game Council	FS20.111	Ātiawa ki Whakarongotai Charitable Trust	FS20.111	Ātiawa ki Whakarongotai Charitable Trust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>Ātiawa do not support the relief sought where it relates to protecting habitats of trout and salmon without any proviso. Ātiawa refer to Policy 9 and Policy 10 of the NPS-FM to support this statement, which affords indigenous freshwater species greater protection than trout and salmon. Additionally, Ātiawa do not support the protection of trout and salmon</p>	Disallow Disallow the relief sought in so far as it relates to the protection of trout and salmon.	Accept in part

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								which have adverse impacts on indigenous ecosystems. Generally the management and decision making in regards to trout and salmon species has not been undertaken within a Treaty Partnership with mana whenua. To accept the relief sought by the submitter would be contrary to Te Tiriti o Waitangi and the national resource management direction.		
S147.013	Wellington Fish and Game Council	FS19.077	Wellington Water Ltd ("Wellington Water")	FS19.077	Wellington Water Ltd ("Wellington Water")	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part
S147.013	Wellington Fish and Game Council	FS30.182	Beef + Lamb New Zealand Ltd	FS30.182	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept in part

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								in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S147.055	Wellington Fish and Game Council			S147.055	Wellington Fish and Game Council	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Acknowledge the need to amend Policy 18 to give effect to the NPS-FM and incorporate the concept of Te Mana o te Wai.</p> <p>However, as drafted the proposed changes to Policy 18 do not give proper effect to Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout, and salmon. The suggested amendment is intended to address this deficiency.</p> <p>It is also important to acknowledge the habitat of valued introduced species such as trout and salmon is given specific recognition under s 7(h) the RMA (1991), which has been carried through to Policy 10 of the NPS-FM.</p>	Amend subclause & correct typographical errors: (g) protecting the habitats of indigenous species, and the habitats of trout and salmon freshwater species are protected	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.055	Wellington Fish and Game Council	FS20.117	Ātiawa ki Whakarongotai Charitable Trust	FS20.117	Ātiawa ki Whakarongotai Charitable Trust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>Ātiawa do not support the relief sought where it relates to protecting habitats of trout and salmon without any proviso. Ātiawa refer to Policy 9 and Policy 10 of the NPS-FM to support this statement, which affords indigenous freshwater species greater protection than trout and salmon. Additionally, Ātiawa do not support the protection of trout and salmon which have adverse impacts on indigenous ecosystems. Generally the management and decision making in regards to trout and salmon species has not been undertaken within a Treaty Partnership with mana whenua. To accept the relief sought by the submitter would be contrary to Te Tiriti o Waitangi and the national resource management direction.</p>	<p>Disallow</p> <p>Disallow the relief sought in so far as it relates to the protection of trout and salmon.</p>	Accept in part
S147.055	Wellington Fish and Game Council	FS19.119	Wellington Water Ltd ("Wellington Water")	FS19.119	Wellington Water Ltd ("Wellington Water")	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.055	Wellington Fish and Game Council	FS30.224	Beef + Lamb New Zealand Ltd	FS30.224	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Accept in part
S149.002	Mangaroa Peatland Focus Group_Matthew Rothwell			S149.002	Mangaroa Peatland Focus Group_Matthew Rothwell	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the	Delete the phrase "and their restoration is promoted".	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.		
S150.002	Mangaroa Peatland Focus Group_Ana Brodie & Mark Leckie			S150.002	Mangaroa Peatland Focus Group_Ana Brodie & Mark Leckie	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S156.002	Mangaroa Peatland Focus Group_Tim Rothwell			S156.002	Mangaroa Peatland Focus Group_Tim Rothwell	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject</p>	Delete the phrase "and their restoration is promoted".	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								to that decision was not and is not a natural wetland.		
S157.012	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.012	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p>	<p>Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines:</p> <p>Delete subclause (c)(c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S157.013	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.013	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p>	Delete subclause: (e) avoiding the loss of river extent and values;	Reject
S157.013	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS27.013	Winstone Aggregates	FS27.013	Winstone Aggregates	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Winstone supports the requested approach of ensuring that the RPS is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers, and accurately reflects the intent of the NPS-FM - i.e. that loss of river extent and values is avoided to the extent practicable, rather than the blanket avoidance approach proposed in the Plan Change.		Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S157.013	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS28.050	Horticulture New Zealand	FS28.050	Horticulture New Zealand	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	HortNZ support aligning with the NPSFM direction	Allow	Reject
S157.014	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.014	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p>	<p>Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines</p> <p>New subclause(s) appropriate provision is made for temporary dewatering activities necessary for construction or maintenance.</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S159.002	Mangaroa Peatland Focus Group_Antony & Jemma Ragg			S159.002	Mangaroa Peatland Focus Group_Antony & Jemma Ragg	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S160.002	Mangaroa Peatland Focus Group_Jen & Chris Priest			S160.002	Mangaroa Peatland Focus Group_Jen & Chris Priest	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".	Reject
S161.002	Grant O'Brien			S161.002	Grant O'Brien	Policy 18: Protecting and restoring ecological health of	Oppose in part	Again, as per above, the recent GWRC vs Adams case has highlighted the fact that GWRC can and has, mis-interpreted what is considered an 'natural inland wetland', and have not	Delete the phrase "and their restoration is promoted".	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						water bodies - regional plans		considered the geomorphological and geological history of the area. Thus, until all natural inland wetlands and coastal wetlands are robustly mapped and understood and affected landowners advised, we do not support any change to this policy as the implications of the change are unknown /unpredictable for potentially affected communities. Landowners would need compensation for losses of investment and livelihood.		
S162.007	Winstone Aggregates			S162.007	Winstone Aggregates	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	Policies (e) and (n) are at odds - (e) requires avoidance of the loss of river extent, while (n) restricts reclamation, piping, straightening or concrete lining of rivers - each of which is a method for losing extent of rivers. An 'avoid' policy is a coarse tool and does not allow for consideration of potential broader ecological outcomes, where significant ecological benefits may be achieved from a project that might require loss of some extent of river. There is potential for significant unintended consequences from this policy, as previously explored during the mediation sessions of the NRP covering P102. The wording of Policy 7 (The loss of river extent and values is avoided to the extent practicable) in the NPS-FM has been incorrectly interpreted by (e) as a straight avoid policy, which it is not.	Amend the policy to more accurately reflect the requirements of the NPS-FM and NES-F: (e) avoiding the loss of river extent and values is avoided where practicable;	Accept in part
S162.007	Winstone Aggregates	FS7.021	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.021	Royal Forest and Bird Protection Society (Forest & Bird)	Policy 18: Protecting and restoring ecological health of	Oppose in part	We acknowledge the wording of Policy 7 (The loss of river extent and values is avoided to the extent practicable) in the NPS-FM. However, Policy 18, as interpreted by (e), is appropriate.	Disallow in part Disallow amendment to (e)	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						water bodies - regional plans				
S162.007	Winstone Aggregates	FS20.275	Ātiawa ki Whakarongotai Charitable Trust	FS20.275	Ātiawa ki Whakarongotai Charitable Trust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>Ātiawa oppose the submissions from Aggregate and Quarry Association and Winstone Aggregates to the extent that the relief sought is inconsistent with national direction, particularly the NPS-FM.</p> <p>Ātiawa are particularly sensitive to aggregate extraction from awa, it is mana whenua who are guaranteed tino rangatiratanga over the land, waterways and all other taonga (including aggregate) through Te Tiriti o Waitangi. Historically aggregate extraction industry has failed to uphold the articles and the principles of Te Tiriti. Additionally, aggregate extraction has adverse effects on te taiao and mana whenua values.</p> <p>On the matter of 'balancing' national policy statements', recent case law states that the NPS-FM 2020 and NPS-UD 2020 are to be read together and reconciled under the regional policy statement and the district plans. It goes on to say, development capacity does not outweigh (trump) Te Mana o te Wai. Te Mana o te Wai is the fundamental concept of freshwater management: any thinking to the converse would not give effect to either national policy statement. Therefore, to reconcile national direction, it is not a balancing act, or even a compromise, the NPS-FM must be given effect to while achieving the purpose of the NPS-UD for example. This can be applied to aggregate extraction, the activity must be</p>	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								consistent with Te Mana o te Wai and the NPS-FM. The need for housing capacity is not license to forgo the requirements of the NPS-FM.		
S163.055	Wairarapa Federated Farmers			S163.055	Wairarapa Federated Farmers	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Defer to full review of the RPS in 2024	That the amendments to Policy 18 be deleted	Reject
S163.055	Wairarapa Federated Farmers	FS7.098	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.098	Royal Forest and Bird Protection Society (Forest & Bird)	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept
S163.055	Wairarapa Federated Farmers	FS20.220	Ātiawa ki Whakarongotai Charitable Trust	FS20.220	Ātiawa ki Whakarongotai Charitable Trust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept

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								decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.		
S163.055	Wairarapa Federated Farmers	FS29.071	Ngā Hapu o Otaki	FS29.071	Ngā Hapu o Otaki	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated	Accept
S163.055	Wairarapa Federated Farmers	FS30.127	Beef + Lamb New Zealand Ltd	FS30.127	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.		
S165.052	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.052	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Various amendments are required in order to ensure the direction and ecological bottom-lines from the RMA, NZCPS and NPSFM are carried through. The NPSFM applies to natural inland wetlands and not coastal wetlands. Complementary policies in the NZCPS apply to coastal wetlands (NZCPS Policies 10, 11, 13, and 14). Accordingly, separate policy direction on coastal wetlands is appropriate.	Amend as follows: Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of water bodies including, which ensure the following: Remove coastal wetlands from clause (c) and include a new policy specifically for coastal wetlands that gives effect to the NZCPS as follows: (x)(i) avoid adverse effects of activities on NZCPS policy 11(a) values of coastal wetlands; (ii) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on any NZCPS policy 11(b) values of coastal wetlands; (iii) preserve the natural character of coastal wetlands in accordance with policy 13 NZCPS; (iv) promote restoration of coastal wetlands in accordance with policy 14 NZCPS; and (v) avoid reclamation in coastal wetlands in accordance with policy 10 NZCPS. Amend clauses (i),(j) and (k) as follows: (i) promoting the retention of retaining in-stream habitat diversity by retaining natural features - such as pools, runs, riffles, and the river's natural	Accept in part

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									<p>form;</p> <p>(j) promoting the retention of retaining natural flow regimes - such as flushing flows;</p> <p>(k) promoting the protection and reinstatement protect and reinstate of riparian habitat;</p> <p>Amend clauses (n)-(q) as follows:</p> <p>(n) discourage restricting avoiding the reclamation, piping, straightening or concrete lining of rivers;</p> <p>(o) discourage restricting avoiding stock access to estuaries, rivers, lakes and wetland;</p> <p>(p) discourage restricting avoiding the diversion of water into or from wetlands - unless the diversion is necessary to restore the hydrological variation to the wetland;</p> <p>(q) discourage restricting the removal or destruction of indigenous plants in wetlands and lakes; and</p> <p>Amend clause (r) as follows:</p> <p>(r) restoring and maintaining indigenous fish passage, except where it is desirable to prevent the passage of some fish species in order to protect indigenous species, their life stages, or their habitats.</p>	

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S165.052	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS22.008	Director-General of Conservation / Tumuaki Ahurei	FS22.008	Director-General of Conservation / Tumuaki Ahurei	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	The requested changes would better give effect to the RMA, NZCPS and NPSFM. However, I note that the requested change to clause (q) appears to be lacking a verb, which presumably should be "avoiding" for consistency with the other changes sought.	Allow Allow, with the addition to clause (q) of "discourage restricting avoiding the removal or destruction..."	Accept in part
S165.052	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS19.033	Wellington Water Ltd ("Wellington Water")	FS19.033	Wellington Water Ltd ("Wellington Water")	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Overly inhibiting for delivery of RSI.	Disallow	Reject
S165.052	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS28.051	Horticulture New Zealand	FS28.051	Horticulture New Zealand	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	The avoid direction sought in (n)-(p) is too absolute for all situations and an approach that is more stringent than the NPSFM has not been justified. The amendment to (q) does not grammatically make sense.	Disallow	Reject
S165.052	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS3.025	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.025	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Waka Kotahi has concerns about the use of the word 'avoiding' and seeks clarity as to how the proposed wording would be implemented.	Disallow	Reject
S165.052	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.074	Ātiawa ki Whakarongotai Charitable Trust	FS20.074	Ātiawa ki Whakarongotai Charitable Trust	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Ātiawa support clarifying and ensuring that the intent of the hierarchy of obligations is upheld.	Allow in part Allow in part, allow the amendment sought to clarify the intended use of subclause (c), noting that the NSP-FM defines the second priority as 'the health needs of people (such as drinking water).	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S165.052	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject
S166.029	Masterton District Council			S166.029	Masterton District Council	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Not Stated / Neutral	We want to see Henley Lake covered as part of this Policy, and the potential for other artificial wetlands that have ecological value to be covered.	Include artificial wetlands for protection.	Reject
S166.029	Masterton District Council	FS19.025	Wellington Water Ltd ("Wellington Water")	FS19.025	Wellington Water Ltd ("Wellington Water")	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Too challenging for wetlands set up to manage stormwater and wastewater discharges.	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S167.080	Taranaki Whānui			S167.080	Taranaki Whānui	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Taranaki Whānui supports the amendments to Policy 18.	Retain as notified.	Accept in part
S168.043	Rangitāne O Wairarapa Inc			S168.043	Rangitāne O Wairarapa Inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The provision as currently worded does not reflect the wording in the NPS FM, which refers to the health and wellbeing of water bodies and freshwater ecosystems. If the policy is exclusively about ecological matters, then the correct terminology is 'ecosystem health' - see Appendix 1A - Compulsory values. It is not clear whether the policy is concentrated on ecosystem health, or is trying to give effect to the full extent of matters addressed in the NPS FM. If it is the latter, the policy needs to go further if it is intended to give effect to the NPS FM.	Amend the policy to: Improve the clarity and better link the subclauses to the main clause of the policy, Reflect that both land and freshwater will need to be managed to give effect to Te Mana o te Wai; Substitute 'ecological health of waterbodies' with the phrase used in the NPS FM, which is 'ecosystem health'; Incorporate the broader concept of "wellbeing" which appears to be missing from this provision and should be included, if the intent of this provision is to give effect to the NPS FM; Reflect the structure of the NPS FM - Te Mana o te Wai should sit in the main clause of the policy as this is the overarching purpose and a holistic concept, ecosystem health is just one component of Te Mana o te Wai, and cannot be considered in isolation of the other components;	Accept in part
S168.043	Rangitāne O Wairarapa Inc	FS28.052	Horticulture New Zealand	FS28.052	Horticulture New Zealand	Policy 18: Protecting and restoring ecological	Support in part	Support alignment with the term 'ecosystem health' in the NPSFM and drafting improvements.	Allow in part	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						health of water bodies - regional plans			Generally allow (subject to specific drafting)	
S168.043	Rangitāne O Wairarapa Inc	FS31.153	Sustainable Wairarapa inc	FS31.153	Sustainable Wairarapa inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread</p>	Not stated	Accept in part

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								<p>support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.044	Rangitāne O Wairarapa Inc			S168.044	Rangitāne O Wairarapa Inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	'Promotion' of various actions will not go far enough to achieve the necessary environmental outcomes. Rangitāne o Wairarapa consider that a level of protection will also be needed.	Substitute the word 'promoting' with text which reflects the need to 'protect to the extent necessary to achieve the environmental outcomes', as 'promoting' is insufficient.	Accept in part
S168.044	Rangitāne O Wairarapa Inc	FS31.154	Sustainable Wairarapa inc	FS31.154	Sustainable Wairarapa inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due	Not stated	Accept in part

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								<p>process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.045	Rangitāne O Wairarapa Inc			S168.045	Rangitāne O Wairarapa Inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Measuring' water takes will not go far enough to achieve TMOTW, these water takes will need to be 'managed' to ensure environmental flows and levels are achieved.	Include provision for managing water takes, not just measuring and evaluating them, to ensure that environmental flows and levels are achieved.	Reject

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S168.045	Rangitāne O Wairarapa Inc	FS31.155	Sustainable Wairarapa inc	FS31.155	Sustainable Wairarapa inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Reject

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								Nga mihi nui Ian Gun		
S168.046	Rangitāne O Wairarapa Inc			S168.046	Rangitāne O Wairarapa Inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The explanatory text for this policy does not appear to refer to the appropriate clauses when describing habitat diversity or activities which impact on habitat diversity. In addition, it is inconsistent with the NPS FM. See Appendix 1A - Compulsory Values in the NPS FM, which describes the five biophysical components of freshwater ecosystem health, and which directs that all five of these components must be managed. Habitat is just one component of freshwater ecosystem health.	Amend the explanatory text to: Refer to 'Ecosystem health' and the five biophysical components of freshwater ecosystem health that must be managed; Substitute 'freshwater ecosystems' for 'aquatic ecosystems'; Remove reference to specific clauses in the policy, as these appear not to capture all activities and also risks inappropriately elevating some activities or aspects above others.	Accept in part

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S168.046	Rangitāne O Wairarapa Inc	FS31.156	Sustainable Wairarapa inc	FS31.156	Sustainable Wairarapa inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

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								Nga mihi nui Ilan Gun		
S168.047	Rangitāne O Wairarapa Inc			S168.047	Rangitāne O Wairarapa Inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Several of the clauses in the policy simply repeat some of the NPS FM policies, which doesn't provide any additional assistance in how these national policies are to be applied at the regional level	Provide direction on how these national policies are to be applied at the regional level.	Accept in part
S168.047	Rangitāne O Wairarapa Inc	FS31.157	Sustainable Wairarapa inc	FS31.157	Sustainable Wairarapa inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due	Not stated	Accept in part

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								<p>process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S169.009	Kahungunu Ki Wairarapa			S169.009	Kahungunu Ki Wairarapa	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	<p>In regard to (a), on behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.</p>	Retain as notified	Accept in part

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S169.009	Kahungunu Ki Wairarapa	FS31.010	Sustainable Wairarapa inc	FS31.010	Sustainable Wairarapa inc	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

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								Nga mihi nui Ian Gun		
S170.032	Te Rūnanga o Toa Rangatira			S170.032	Te Rūnanga o Toa Rangatira	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>The policy seems to be strengthened by using the word 'avoid' in the Policy 18 (e), (f), (g), (h) and (i) maintaining the fish passages. It is unclear, though, if the policy intention is being levelled down with the word use of 'promoting' in the clause (a), (b), (c), and (d).</p> <p>It is unclear whether the hierarchy of these clauses are considered; where 'avoidance' should be emphasized more than the 'promotion' side of the Policy 18 whether should the 'avoiding' clauses be coming first before the less directive clauses. The wording 'promote' could be rewritten into 'ensure' or 'give effect to' and rendered to a more impactful and directive policy wording instead of promoting. This will balance the priorities targeted within this policy; 'avoid' and 'ensure' reflects better of the intention of the Policy 18.</p> <p>This Policy could apply to regional plans and the district plans.</p>	Use strong wordings like 'avoid' , 'ensure' or 'give effect to' in this policy.	Accept in part

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S170.032	Te Rūnanga o Toa Rangatira	FS29.146	Ngā Hapu o Otaki	FS29.146	Ngā Hapu o Otaki	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		
S16.054	Kāpiti Coast District Council			S16.054	Kāpiti Coast District Council	Policy FW.1: Reducing water demand - regional plans	Support	<p>Council notes the actions identified for regional plans to reduce water demand are necessary to give effect to the NPS-FM, although it is unclear how regional plans will be able to address all the matters via regulatory methods such as addressing public and private water losses from leaks.</p> <p>Council recommends GWRC works in collaboration with city and district councils to identify and implement the actions that would be necessary to achieve the relevant objective(s) - noting the most efficient and effective methods for some of the actions are likely to be non-regulatory or non-RMA regulatory methods.</p>	<p>Amend as follows:</p> <p>Policy FW.1: Reducing water demand - regional plans Greater Wellington Regional Council will work with city and district councils to investigate, identify and implement the most appropriate methods to reduce water demand. This may include non-regulatory or alternative methods. Regional plans shall may include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including:</p> <p>(a)...</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.043	Porirua City Council			S30.043	Porirua City Council	Policy FW.1: Reducing water demand - regional plans	Support	Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions.	Retain as notified.	Accept in part
S30.043	Porirua City Council	FS25.076	Peka Peka Farm Limited	FS25.076	Peka Peka Farm Limited	Policy FW.1: Reducing water demand - regional plans	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part
S34.068	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.068	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy FW.1: Reducing water demand - regional plans	Support in part	In regard to clause (a) it is unclear how provisions in a RPS are expected to address leaks when this is a maintenance issue, and delivery will be impractical within the context of three waters reform.	Review to ensure provisions can be implemented.	Accept in part
S79.031	South Wairarapa District Council			S79.031	South Wairarapa District Council	Policy FW.1: Reducing water demand - regional plans	Support in part	This policy appropriately directs regional plans to undertake demand management directions. However, the policy as written suggests an over reduction in demand from current levels. The s.32 does not outline the need for reduction, nor adequately identifies the costs of the policy, particularly with regard to the significant growth promoted by the plan change and the existing RPS.	Amend Policy FW.1 to replace 'reduce demand' to 'increase efficiency'.	Reject
S113.024	Wellington Water			S113.024	Wellington Water	Policy FW.1: Reducing water demand - regional plans	Support in part	Align the language with other GW documents and provide aligned definitions. Taumata Arowai uses the terms Small, Medium and Large Networked Supplies. Group Supplies as defined in the pNRP aligns with Small and Medium, while Community Supplies and Large Networked Supplies also align Extra wording to FW.1(d) for clarity.	Amend the policy: (d) provisions requiring water conservation measures, particularly in the summer months. Amend the Explanation: Policy FW.1 requires regional plans to address the reduction of	Accept in part

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									demand in community or group municipal water supplies.	
S113.024	Wellington Water	FS28.053	Horticulture New Zealand	FS28.053	Horticulture New Zealand	Policy FW.1: Reducing water demand - regional plans	Support in part	HortNZ support alignment with terms used by Taumata Arowai in terms of the water suppliers that the provision applies to (where these align with intent)	Allow in part	Accept in part
S115.043	Hutt City Council			S115.043	Hutt City Council	Policy FW.1: Reducing water demand - regional plans	Not Stated / Neutral	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.	Accept
S128.034	Horticulture New Zealand			S128.034	Horticulture New Zealand	Policy FW.1: Reducing water demand - regional plans	Support in part	This provision refers to 'registered water suppliers and users' in the body of the policy, but 'municipal water supplies' in the explanation. The use of the term 'registered water suppliers' means that the scope of the policy is potentially very broad - light of recent changes to the drinking water statutory framework e.g., Water Services Act, which has changed who is a 'drinking water supplier' - however the policy appears to be most relevant to Council supplies.	Amend as follows: Regional plans shall include policies, rules and/or methods to reduce demand of water from registered municipal water suppliers and users, including:	Reject
S131.067	Ātiawa ki Whakarongotai Charitable Trust			S131.067	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.1: Reducing water demand - regional plans	Support	Ātiawa supports in principle reducing demand on water supply and encouraging more efficient use of water.	Retain as notified	Accept in part

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S131.067	Ātiawa ki Whakarongotai Charitable Trust	FS29.337	Ngā Hapu o Otaki	FS29.337	Ngā Hapu o Otaki	Policy FW.1: Reducing water demand - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept in part

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S140.044	Wellington City Council (WCC)			S140.044	Wellington City Council (WCC)	Policy FW.1: Reducing water demand - regional plans	Support	Support as proposed.	Retain as notified.	Accept in part
S147.056	Wellington Fish and Game Council			S147.056	Wellington Fish and Game Council	Policy FW.1: Reducing water demand - regional plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.	Accept in part
S147.056	Wellington Fish and Game Council	FS19.120	Wellington Water Ltd ("Wellington Water")	FS19.120	Wellington Water Ltd ("Wellington Water")	Policy FW.1: Reducing water demand - regional plans	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS. Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified. Some of the amendments undermine the more detailed content of PC1.</p>		
S147.056	Wellington Fish and Game Council	FS30.225	Beef + Lamb New Zealand Ltd	FS30.225	Beef + Lamb New Zealand Ltd	Policy FW.1: Reducing water demand - regional plans	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	Disallow That the submission be disallowed with the exception of 147.007	Reject
S163.056	Wairarapa Federated Farmers			S163.056	Wairarapa Federated Farmers	Policy FW.1: Reducing water demand - regional plans	Oppose	<p>Defer to full review of the RPS in 2024</p> <p>Considers that these matters were very recently the subject of mediated agreements during the pNRP hearing</p>	That Policy FW.1 be deleted	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								and that this policy is relitigating the same issues.		
S163.056	Wairarapa Federated Farmers	FS7.099	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.099	Royal Forest and Bird Protection Society (Forest & Bird)	Policy FW.1: Reducing water demand - regional plans	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept
S163.056	Wairarapa Federated Farmers	FS20.221	Ātiawa ki Whakarongotai Charitable Trust	FS20.221	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.1: Reducing water demand - regional plans	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
S163.056	Wairarapa Federated Farmers	FS29.072	Ngā Hapu o Otaki	FS29.072	Ngā Hapu o Otaki	Policy FW.1: Reducing water demand - regional plans	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>		
S163.056	Wairarapa Federated Farmers	FS30.128	Beef + Lamb New Zealand Ltd	FS30.128	Beef + Lamb New Zealand Ltd	Policy FW.1: Reducing water demand - regional plans	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Reject
S165.053	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.053	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy FW.1: Reducing water demand - regional plans	Support		Retain	Accept in part
S165.053	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.075	Ātiawa ki Whakarongotai Charitable Trust	FS20.075	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.1: Reducing water demand - regional plans	Support	Ātiawa supports in principle reducing demand on water supply and encouraging more efficient use of water.	Allow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S165.053	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy FW.1: Reducing water demand - regional plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject
S167.081	Taranaki Whānui			S167.081	Taranaki Whānui	Policy FW.1: Reducing water demand - regional plans	Support in part	Support with amendments proposing a stronger partnership with mana whenua	Amend the policy to read: Regional plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users to the limits set in partnership with tangata whenua / mana whenua , including:	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.055	Rangitāne O Wairarapa Inc			S168.055	Rangitāne O Wairarapa Inc	Policy FW.1: Reducing water demand - regional plans	Support in part	<p>There is an inconsistency in the language used in this policy (and in FW.2) and Policy 17 with respect to the public water supply. This needs addressing as it is confusing as to what water users the policy applies to.</p> <p>Other ways to reduce water demand include recycling or reusing water.</p>	<p>Amend the policy to:</p> <p>'Eliminate' leaks, not 'address' them (clause a)</p> <p>Require efficient use of water for all users, not just new developments;</p> <p>Require' alternative water supplies, not 'address' them (clause c);</p> <p>Adopt consistEnt language with other provisions with respect to water users;</p> <p>Correct the grammatical tense in the opening clause ('for' not 'of');</p> <p>Insert additional policy clauses addressing water recycling, and address these matters; and water conservation, in the explanatory text.</p>	Accept in part
S168.055	Rangitāne O Wairarapa Inc	FS31.165	Sustainable Wairarapa inc	FS31.165	Sustainable Wairarapa inc	Policy FW.1: Reducing water demand - regional plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff</p>	Not stated	Accept in part

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								<p>will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S170.027	Te Rūnanga o Toa Rangatira			S170.027	Te Rūnanga o Toa Rangatira	General comments - regulatory policies	Support in part	<p>The wording of Policy FW.1 clause (b) takes away from the strength this Policy is anchored on. This could be rewritten to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.</p> <p>The clause (c) is using the word 'minimise' which does not have teeth when it comes to rules in the district plans, and their implementation. This clause caveats the land contours and extent practicable; it is unclear what triggers (rules) District Plans would have, this to be implemented.</p> <p>Most of the land is on challenging contours in Wellington and on hills that need to be cut out for feasible development to occur. Any mitigation that might be possible for flatter regions such as, Waikato or Auckland, may not be realisable, possible, or feasible in Greater Wellington.</p> <p>The policy should acknowledge and change the wording to say, if it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place.</p> <p>In summary, the policy contradicts itself because minimising earthworks in Wellington may not be able to be an option in some instances due to topography and soil conditions.</p> <p>The drafting intent of Policy FW.1 (f)</p>	<p>Rewrite Policy FW.1 clause (b) to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.</p> <p>Use stronger wording than 'minimise' in clause (c) and ensure the policy is worded in a way that the District Plan rules which flow on from this provision can be implemented. E.g. it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place. Ensure the provision is workable given the topographical and geological context.</p> <p>Ensure there are stormwater-basics and bottom lines, the 'musts of stormwater management and land development' are captured in this policy. If these are first achieved then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention.</p> <p>The policy also needs to acknowledge the need of additional infrastructure and provides for safe and clever solutions for communities.</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>is optimistic to reflect achieving multiple gains for stormwater management. In our built / urban environments, we observe the multiple issues of our stormwater network which won't be able to achieve the intent of this Policy.</p> <p>The policy should ensure there are stormwater-basics and bottom lines are achieved- not compromised then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention. The policy should focus on absolute musts of stormwater management and land development and acknowledge in the absence of standards and bottom lines, delivering other aspects may be a luxury. The policy needs to ensure the stormwater system provides safe and clever solutions to our communities then the rest, multiple positive outcomes, will come.</p> <p>The policy also needs to acknowledge the need of additional infrastructure to be able to give effect to this Policy.</p>		

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S170.027	Te Rūnanga o Toa Rangatira	FS29.141	Ngā Hapu o Otaki	FS29.141	Ngā Hapu o Otaki	Policy FW.1: Reducing water demand - regional plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

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								<p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		
S16.055	Kāpiti Coast District Council			S16.055	Kāpiti Coast District Council	Policy FW.2: Reducing water demand - district plans	Support in part	<p>Council supports the requirement for district plans to include provisions requiring alternative water supplies for non-potable use in new developments. The Operative Kapiti Coast District Plan 2021 includes such provisions for new residential units.</p> <p>Council does not support the requirement for district plans to include provisions to improve the efficiency of the end use of water on a per capita basis for new developments. We have some experience in district plan provisions that attempt to achieve this (See Appendix 3.1 of the Operative Kapiti Coast District Plan 2021 - Development Incentives). We can</p>	<p>Amend Policy FW.2 as follows:</p> <p>Policy FW.2: Reducing water demand - district plans</p> <p>District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable:(a) provisions improving the efficiency of the end use of water on a per capita basis for new developments; and</p> <p>(ba) provisions requiring alternate water supplies for non-potable use in new developments such as</p>	Accept

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								advise that such provisions are ineffective and cannot be enforced due to the ability for water end-use systems or technology to be easily exchanged for non-efficient systems or technology e.g. water efficient appliances, toilets, shower heads etc. There is no way to monitor or enforce such provisions. Council has found the most effective method to significantly reduce water demand is the installation of water meters combined with education initiatives including the provision of free advice on how ratepayers can reduce water use. These are not methods under the RMA.	the requirement to install rainwater tanks.	
S16.055	Kāpiti Coast District Council	FS19.022	Wellington Water Ltd ("Wellington Water")	FS19.022	Wellington Water Ltd ("Wellington Water")	Policy FW.1: Reducing water demand - regional plans	Oppose	Need as many tools available as possible.	Disallow	Reject
S25.024	Carterton District Council			S25.024	Carterton District Council	Policy FW.2: Reducing water demand - district plans	Support in part	<p>CDC generally supports this policy.</p> <p>However, CDC questions the efficiency and effectiveness of point (a), particularly a regulatory approach in District Plans. We understand the intent of this point is to require the installation of water efficient appliances, showers and toilets. However, the costs of compliance and enforcement would be high, in particular to ensuring ongoing compliance.</p> <p>CDC considers other (non-regulatory) methods such as water meters and education on efficient use of water are more effective and efficient.</p>	Delete point (a) from Policy FW.2.	Accept

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S30.044	Porirua City Council			S30.044	Porirua City Council	Policy FW.2: Reducing water demand - district plans	Oppose	<p>Council supports the policy intent of reducing water demand. However, the policy lacks the necessary precision to enable its meaningful implementation, directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concerns include:</p> <ul style="list-style-type: none"> • It is not within the knowledge of a territorial authority to identify the per capita efficiency of the end use of water. • District plans can only manage the use, development, and subdivision of land. Council's PDP requires water meters for new buildings through the Three Waters Chapter, but it is not clear how this would extend to requiring how water is used by individuals. This is not possible through a district plan. • The policy seems to require that district plans require individuals to use their grey water over potable water in certain circumstances. It is questionable whether this is an appropriate matter for a district plan to address in terms of s31 of the RMA, and whether it would be better addressed in a regional plan. There is also duplication between FW.1 and FW.2 in respect of provisions requiring efficient end use of water for new development and alternate water supplies for non-potable uses. • Development is not defined, and the policy is not calibrated to any particular scale of development. As 	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows:</p> <p>District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable:</p> <p>(a) provisions improving requiring improvements to the efficiency of the end use of water on a per capita basis for new developments; and</p> <p>(b) provisions requiring alternate water supplies for non-potable use in new developments.</p> <p>Include a definition of 'registered water suppliers'.</p>	Accept in part

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								<p>such it would require a far-reaching regulatory framework that has not been justified in the s32 Evaluation for the RPS</p> <ul style="list-style-type: none"> • Suggest deletion of the reference to provisions as these are methods. • It is unclear what is meant by "reduce demand of water from registered water suppliers and users". 		
S30.044	Porirua City Council	FS19.030	Wellington Water Ltd ("Wellington Water")	FS19.030	Wellington Water Ltd ("Wellington Water")	Policy FW.1: Reducing water demand - regional plans	Support in part	Support improving the clarity of the policy, however, the wording may need to be further refined to achieve the intended outcomes.	Allow in part Accept with changes	Accept in part
S30.044	Porirua City Council	FS25.077	Peka Peka Farm Limited	FS25.077	Peka Peka Farm Limited	Policy FW.1: Reducing water demand - regional plans	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part

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S34.069	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.069	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy FW.2: Reducing water demand - district plans	Oppose	<p>It is unclear what is meant by 'registered water suppliers and users'. Is this intended to have the same definition as Taumata Arowai - the Water Services Regulator Act 2020?</p> <p>Council notes that if the RPS also refers to existing registered water suppliers and users, territorial authorities have no authority to impose conditions over them.</p> <p>There appears to be no provisions in section 31 of the RMA to support this requirement and section 30 of the RMA identifies the development of rules "if appropriate", for the taking and use of water, as a function of the regional council. It is also unclear how this will work within the context of the three waters reform.</p> <p>Beyond this, if they are existing registered users, we do not have the ability to impinge on existing use rights in district plans, this is a regional council function only.</p> <p>A policy within an RPS should not direct joint processing of developments. This is impracticable given the separation of powers between regional and district/city councils.</p> <p>Council does not consider district plans an appropriate mechanism to regulate end water use per capita and considers this is best handled within the Building Act.</p>	Delete policy or amend to establish non-regulatory methods.	Reject
S79.032	South Wairarapa District Council			S79.032	South Wairarapa District Council	Policy FW.2: Reducing	Oppose	The policy repeats the matters already more appropriately addressed in FW1.	Delete	Reject

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						water demand - district plans				
S113.025	Wellington Water			S113.025	Wellington Water	Policy FW.2: Reducing water demand - district plans	Support in part	Align the language with other GW documents and provide aligned definitions.	Amend the Explanation: Policy FW.2 requires regional plans to address the reduction of demand in community or group municipal water supplies.	Accept in part
S113.025	Wellington Water	FS28.054	Horticulture New Zealand	FS28.054	Horticulture New Zealand	Policy FW.2: Reducing water demand - district plans	Support in part	HortNZ support alignment with terms used by Taumata Arowai in terms of the water suppliers that the provision applies to (where these align with intent)	Allow in part	Accept in part
S115.044	Hutt City Council			S115.044	Hutt City Council	Policy FW.2: Reducing water demand - district plans	Oppose	<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.</p> <p>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"> Wellington Water Limited or its successors as a water provider The regional council as a water take and use consenting authority <p>In addition, if the policy is retained, there is an error in Table 4 (see our comments on Policy FW.1)</p>	<p>Delete policy, or</p> <p>Amend as follows:</p> <p>"Policy FW.2: Reducing water demand - district plans</p> <p>District plans shall include policies, rules and/or 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 on a per capita basis for new developments; and</p> <p>(b) provisions requiring alternate water supplies for non-potable use in new developments.</p> <p>..."</p> <p>And correct Table 4 to refer to Method 1 rather than Method 2.</p>	Accept in part

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S128.035	Horticulture New Zealand			S128.035	Horticulture New Zealand	Policy FW.2: Reducing water demand - district plans	Support in part	This provision refers to 'registered water suppliers and users' in the body of the policy, but 'municipal water supplies' in the explanation. The use of the term 'registered water suppliers' means that the scope of the policy is potentially very broad - light of recent changes to the drinking water statutory framework e.g., Water Services Act, which has changed who is a 'drinking water supplier' - however the policy appears to be most relevant to Council supplies.	Amend as follows: District plans shall include policies, rules and/or methods to reduce demand of water from registered municipal water suppliers and users, including where practicable:	Reject
S131.068	Ātiawa ki Whakarongotai Charitable Trust			S131.068	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.2: Reducing water demand - district plans	Support	Ātiawa supports in principle reducing demand on water supply and encouraging more efficient use of water.	Retain as notified.	Accept in part
S131.068	Ātiawa ki Whakarongotai Charitable Trust	FS29.338	Ngā Hapu o Otaki	FS29.338	Ngā Hapu o Otaki	Policy FW.2: Reducing water demand - district plans	Support	Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community. There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes. This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent	Not stated	Accept in part

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								<p>awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		

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S140.045	Wellington City Council (WCC)			S140.045	Wellington City Council (WCC)	Policy FW.2: Reducing water demand - district plans	Oppose	<p>Both provisions overlap with the Building Act and the policy is not specific as to how this will be achievable under the RMA.</p> <p>Additionally, since the monitoring and enforcement of these provisions will also fall under the Building Act and it is unlikely, we do not have tools to monitor the efficacy of this policy.</p> <p>In terms of water demand management, the use of nonpotable water and the management of end of use water will not be effective. If reducing water demand is the goal, then the focus should be on the water that is being lost to leaks in the infrastructure and on understanding water use per house.</p> <p>The point of rainwater storage and use (non-potable water) is also already addressed in Policy 44 point (h).</p>	Delete Policy FW.2	Reject
S140.045	Wellington City Council (WCC)	FS14.039	Masterton District Council	FS14.039	Masterton District Council	Policy FW.2: Reducing water demand - district plans	Support in part	Agree with reasons that WCC have outlined.	Not stated We don't support deleting the policy but agree with some of the points WCC have raised regarding Policy FW.2	Accept
S147.057	Wellington Fish and Game Council			S147.057	Wellington Fish and Game Council	Policy FW.2: Reducing water demand - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.	Accept in part
S147.057	Wellington Fish and Game Council	FS19.121	Wellington Water Ltd ("Wellington Water")	FS19.121	Wellington Water Ltd ("Wellington Water")	Policy FW.2: Reducing water demand - district plans	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p>	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>		
S147.057	Wellington Fish and Game Council	FS30.226	Beef + Lamb New Zealand Ltd	FS30.226	Beef + Lamb New Zealand Ltd	Policy FW.2: Reducing water demand - district plans	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	Disallow That the submission be disallowed with the exception of 147.007	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S158.021	Kāinga Ora Homes and Communities			S158.021	Kāinga Ora Homes and Communities	Policy FW.2: Reducing water demand - district plans	Support in part	Seeks that the policy is amended to remove the requirement to improve the efficiency of the end use of water on a per capita basis. Seeks that the policy rather seek for the inclusion of water efficient methods are installed per new household or alternative solutions are provided within larger developments where more efficient solutions that are more 'nature-based' could be used. e.g. community rain gardens, stormwater ponds.	Amend the policy as follows: District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable: (a) provisions improving the efficiency of the end use of water on a per capita basis for new developments per new household equivalent through devices such as low flow fixtures; and (b) provisions improving the efficiency of the end use of water at a community scale for large scale developments; and(c) provisions requiring alternate water supplies for non-potable use in new developments.	Accept in part
S158.021	Kāinga Ora Homes and Communities	FS14.011	Masterton District Council	FS14.011	Masterton District Council	Policy FW.2: Reducing water demand - district plans	Support in part	Agree with: Seeks that the policy is amended to remove the requirement to improve the efficiency of the end use of water on a per capita basis. Seeks that the policy rather seek for the inclusion of water efficient methods are installed per new household or alternative solutions are provided within larger developments where more efficient solutions that are more 'nature-based' could be used. e.g. community rain gardens, stormwater ponds.	Not stated Agree with relief sought: Amend the policy as follows: District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable: (a) provisions improving the efficiency of the end use of water on a per capita basis for new developments per new household equivalent through devices such as low flow fixtures; and (b) provisions improving the efficiency of the end use of water at a community scale for large scale developments; and(c)	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									provisions requiring alternate water supplies for non-potable use in new developments.	
S158.022	Kāinga Ora Homes and Communities	FS1.004	Investore Property Limited	FS1.004	Investore Property Limited	Policy FW.4: Financial contributions for urban development - district plans	Support	It is inappropriate and unnecessary for the RPS to require district plans to require financial contributions to be paid for stormwater mitigation. The territorial authority should retain discretion to undertake an assessment.	Allow	Reject
S163.057	Wairarapa Federated Farmers			S163.057	Wairarapa Federated Farmers	Policy FW.2: Reducing water demand - district plans	Oppose	Defer to full review of the RPS in 2024 Considers that these matters were very recently the subject of mediated agreements during the pNRP hearing and that this policy is relitigating the same issues.	That Policy FW.2 be deleted	Reject
S163.057	Wairarapa Federated Farmers	FS7.100	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.100	Royal Forest and Bird Protection Society (Forest & Bird)	Policy FW.2: Reducing water demand - district plans	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept in part
S163.057	Wairarapa Federated Farmers	FS20.222	Ātiawa ki Whakarongotai Charitable Trust	FS20.222	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.2: Reducing water demand - district plans	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.		
S163.057	Wairarapa Federated Farmers	FS29.073	Ngā Hapu o Otaki	FS29.073	Ngā Hapu o Otaki	Policy FW.2: Reducing water demand - district plans	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>		Accept in part
S163.057	Wairarapa Federated Farmers	FS30.129	Beef + Lamb New Zealand Ltd	FS30.129	Beef + Lamb New Zealand Ltd	Policy FW.2: Reducing water demand - district plans	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any	Allow	Reject

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								other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.		
S165.054	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.054	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy FW.2: Reducing water demand - district plans	Support		Retain	Accept in part
S165.054	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.076	Ātiawa ki Whakarongotai Charitable Trust	FS20.076	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.2: Reducing water demand - district plans	Support	Ātiawa supports in principle reducing demand on water supply and encouraging more efficient use of water.	Allow	Accept in part
S165.054	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy FW.2: Reducing water demand - district plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and	Disallow	Reject

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								confusion amongst those who it impacts materially.		
S166.057	Masterton District Council			S166.057	Masterton District Council	Policy FW.2: Reducing water demand - district plans	Support in part	Agree - but we need to specify how one will use this in practice. Will this hinder intensification?	Retain as notified. However: Further clarify the impacts on intensification.	Accept in part
S167.082	Taranaki Whānui			S167.082	Taranaki Whānui	Policy FW.2: Reducing water demand - district plans	Support in part	Support with amendments providing a stronger partnership with mana whenua and not restricting policy direction to new infrastructure	Amend clause (a) to read: (a) provisions improving the efficiency of the end use of water on a per capita basis for new developments; and	Reject
S167.083	Taranaki Whānui			S167.083	Taranaki Whānui	Policy FW.2: Reducing water demand - district plans	Support in part	Support with amendments providing a stronger partnership with mana whenua and not restricting policy direction to new infrastructure	Amend clause (b) to read: (b) provisions requiring alternate water supplies for non-potable use in new developments.	Reject
S167.084	Taranaki Whānui			S167.084	Taranaki Whānui	Policy FW.2: Reducing water demand - district plans	Support in part	Support with amendments providing a stronger partnership with mana whenua and not restricting policy direction to new infrastructure	Amend the policy to read: District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users to the limits set in partnership with tangata whenua / mana whenua , including where practicable:	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.056	Rangitāne O Wairarapa Inc			S168.056	Rangitāne O Wairarapa Inc	Policy FW.2: Reducing water demand - district plans	Support in part	<p>There is an inconsistency in the language used in this policy (and in FW.1) and Policy 17 with respect to the public water supply. This needs addressing as it is confusing as to what water users the policy applies to.</p> <p>Policy 11 of the NPS FM is worded in such a way as to 'require' efficient use by all users, not just new developments.</p>	<p>Amend the policy to:</p> <p>Adopt consistent language with other provisions with respect to water users;</p> <p>Require efficient use of water for all users, not just new developments (clause a);</p> <p>'Require' alternative water supplies, not 'address' them (clause c);</p> <p>Adopt consistent language with other provisions with respect to water users;</p> <p>Correct the grammatical tense in the opening clause ('for' not 'of').</p>	Accept in part
S168.056	Rangitāne O Wairarapa Inc	FS31.166	Sustainable Wairarapa inc	FS31.166	Sustainable Wairarapa inc		Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due</p>	Not stated	Accept in part

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								<p>process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>		

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S16.080	Kāpiti Coast District Council			S16.080	Kāpiti Coast District Council	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>Council opposes a number of provisions within this policy on the basis they:</p> <ol style="list-style-type: none"> attempt to transfer some regional council responsibilities for freshwater to city and district councils under the guise of the reference to integrated management under section 31 of the RMA. lack detail on how they would be implemented including what the subdivision, use and development triggers would be for their implementation. <p>In places the policy merely repeats provisions of the NPS-FM and attempts to transfer them into a policy for city and district councils to implement via district plans. The main NPS-FM policies that are relevant appear to be Policies 3 and 7. Although we agree the NPS-FM introduces freshwater management considerations into the RMA plan making processes of city and district councils, we are concerned at the blunt approach taken by proposed Policy FW.3, and the apparent lack of consideration of the roles, functions, and expertise of city and district councils. It is our view the RPS is required to take a much more refined and carefully justified approach in setting requirements for district plans in the management of freshwater. This should be carried out in direct consultation with the technical experts of the city and district councils in the region.</p> <p>We consider the approach taken is</p>	<p>Either:</p> <p>Delete Policy FW.3 and redraft in collaboration with technical experts from city and district councils to prepare a variation to the RPS Change 1; or</p> <p>Delete clauses b, f, g, h, m, n, and o.</p>	Accept in part

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								<p>not consistent with the intent of the NPS-FM for the following reasons:</p> <p>1. The section 32 evaluation supporting the NPS-FM states:</p> <p>a. All councils will be affected as regional policy statements, regional plans and district plans are all required to give effect to the NPS-FM 2020. All councils will also need to observe and enforce compliance with the NES-F. However, regional councils will be more affected as the matters addressed by the NPS-FM 2020 and NES-F are more within their functions(2).</p> <p>[Note '2' references Action for Health Waterways Section 32 Evaluation, Ministry for the Environment, 22 July 2020, page 18]</p> <p>b. There is a low level of uncertainty associated with Policy 3 because it closely reflects the statutory functions of local councils in section 31 of the RMA but gives greater specificity in regarding the whole-of-catchment approach. Any risk of overlap or confusion on roles or responsibilities is low (3).</p> <p>[Note '3' references: Action for Health Waterways Section 32 Evaluation, Ministry for the Environment, 22 July 2020, page 44.]</p> <p>2. Council notes the guidance on this matter released by the Ministry for the Environment for territorial local authorities does not support the approach taken by Policy FW.3 as follows:</p>		

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								<p>The NPS-FM 2020 does not provide specific directions about what approaches territorial authorities should use to manage the effects of land use and development on freshwater in district plans. The approach provides flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district .</p> <p>Council would therefore expect the RPS to be drafted without introducing confusion over roles and responsibilities for freshwater. The RPS should include requirements for the district plan include provisions that consider the cumulative effects of development on freshwater in catchments in accordance with the integrated management of natural resources. Such an approach would fit well with the yet to be developed Waitua plan for the Kapiti Coast District. However, we expect such direction to be accompanied by policies that direct and inform city and district councils on how to achieve this within the roles and functions city and district councils have under the RMA. Council understands such an approach would be consistent with the intent of the NPS-FM. The transfer of functions approach proposed by RPS Change 1 does not appear to have been adequately considered as it conflicts with the Governments section 32 for the NPS-FM and MfE guidance on the roles of regional and city and district councils in giving effect to the NPS-FM. The Policy FW.3 provisions of most concern to us with respect to</p>		

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								lack of clarity and the attempt to transfer regional council functions to Council are clauses b, f, g, h, m, n, and o.		
S25.025	Carterton District Council			S25.025	Carterton District Council	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>CDC opposes this policy, as it goes far beyond what is required by the NPS-FM. CDC does not have the in-house capability to provide an assessment against these matters, and considers that most of these matters sit more comfortably within the regional council functions.</p> <p>CDC requests that the policy is amended so that it is consistent with section 3.5(4) of the NPS-FM, but does not go beyond the ambit of that provision.</p>	Amend the policy so that it addresses only those matters addressed in section 3.5(4) of the NPS-FM.	Accept

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S30.045	Porirua City Council			S30.045	Porirua City Council	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation and directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concern include:</p> <ul style="list-style-type: none"> • Reference to clause 3.5(4) is not helpful and duplicates the NPS-FM. The purpose of the policy should be to set out the regional direction that councils are to follow, and how Te Mana o te Wai is to be implemented. Regional councils through their RPS and regional plans are required to set out what Te Mana o te Wai is and means. • (a): the requirement to partner with mana whenua in the development of district plans is broader than what this policy addresses. It is already a requirement of s8 of the RMA, if it is to be repeated in the RPS it should be a separate overarching policy. And in doing so, there needs to be clear direction as to what this means. • (b): It is unclear how or why district plans should be protecting and enhancing Māori freshwater values if they are protected through a regional plan. • (c): Again, this is a broader obligation on TAs irrespective under s6(e) of the RMA, and this clause does not add any value or guidance. It should sit as a separate policy with some actual guidance and direction. 	<p>Delete policy. OR</p> <p>Alternatively, amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and delete (g), (h), (o), (p) and (q).</p> <p>Amend the explanation as follows:</p> <p>Explanation</p> <p>Policy FW.3 requires district plans to manage the effects of urban development on freshwater and the coastal marine area. This is to the extent that is relevant under a territorial authority's functions under section 31 of the RMA and in a manner that does not duplicate the functions of the Regional Council under section 30 of the RMA.</p>	Accept in part

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								<ul style="list-style-type: none"> • (d): the effects of urban development on what? This needs to provide guidance as to what is required to be considered. • (g): To what extent? and what aspects/effects need to be covered that aren't addressed by Regional Plan provisions? There is no guidance in the RPS as to what this may mean. • (h): How does the regional council envisage this occurring? There is no guidance in the RPS as to what this may mean. • (i): The two parts of this clause are unclear as to what is exactly proposed here. • (k): The RPS needs to contain guidance and direction about what sort of protection and enhancement is envisaged here, beyond what is already controlled through the Regional Plan. • (l): This clause seems to repeat clause k above. Guidance should be provided on the size and nature of these buffers, i.e. on the face of this clause a district plan could impose a 1cm buffer and it has given effect to it. It should also set out what the buffer is for, i.e. natural character, habitat protection? Regulating the piping of streams is a regional council function. • (o): Minimise the extent of impervious surfaces for what reason? Also, isn't this already covered by clause (i)? The discharge of contaminants is a regional council 		

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								<p>function under s30 of the RMA.</p> <ul style="list-style-type: none"> • (p): The daylighting of streams is a regional council function. • (q): It is unclear what is sought beyond what is already managed by the Regional Council through the NES-DW. 		
S30.045	Porirua City Council	FS25.078	Peka Peka Farm Limited	FS25.078	Peka Peka Farm Limited		Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part
S32.017	Director-General of Conservation			S32.017	Director-General of Conservation	Policy FW.3: Urban development effects on freshwater and the coastal marine	Support in part	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely	Retain as notified, except for the following change: "(p) Consider Encourage and support daylighting of streams, where practicable;	Reject

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						area - district plans		affects their health and well-being and their extent and values. The requirement for "considering" daylighting of streams where practicable provides no clarity of the intended outcome and should be strengthened.		
S32.017	Director-General of Conservation	FS20.011	Ātiawa ki Whakarongotai Charitable Trust	FS20.011	Ātiawa ki Whakarongotai Charitable Trust		Support	Ātiawa support actions that enable streams to flow, move and meander naturally, including daylighting of streams.	Allow	Reject
S32.017	Director-General of Conservation	FS30.295	Beef + Lamb New Zealand Ltd	FS30.295	Beef + Lamb New Zealand Ltd		Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S32.033	Director-General of Conservation			S32.033	Director-General of Conservation	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	<p>The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.</p> <p>The requirement for "considering" daylighting of streams where practicable provides no clarity of the intended outcome and should be strengthened.</p>	add a new subclause as follow or words to like effect: "Require that urban development is located and designed to allow water bodies to meander and move naturally" .	Reject
S32.033	Director-General of Conservation	FS12.002	Kāinga Ora - Homes and Communities	FS12.002	Kāinga Ora - Homes and Communities		Oppose	Kāinga Ora acknowledges that, where possible, urban development should be located and designed to allow water bodies to meander and move naturally; however, Kāinga Ora considers that this will not be possible in all development situations. Further to this, Kāinga Ora considers that this is a matter that is more appropriately managed through a Regional Plan, rather than District Plan.	Disallow	Accept
S32.033	Director-General of Conservation	FS20.014	Ātiawa ki Whakarongotai Charitable Trust	FS20.014	Ātiawa ki Whakarongotai Charitable Trust		Support	Ātiawa support actions that enable streams to flow, move and meander naturally, including daylighting of streams.	Allow	Reject
S32.033	Director-General of Conservation	FS30.311	Beef + Lamb New Zealand Ltd	FS30.311	Beef + Lamb New Zealand Ltd		Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S34.056	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.056	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>Council supports the intent to give effect to Te Mana o te Wai but is concerned that this policy appears to include a list of matters over which authorities should restrict their discretion and some matters seem to go beyond what is required in the NPS- FM.</p> <p>The policy also seems want to transfer some of the regional council functions to district and city council without fully understanding the implications of doing so and could make some infrastructure projects difficult to achieve.</p> <p>Some clauses such as clause (i) seem to require a consent requirement, which Councils may not be resourced to address.</p> <p>Council considers that this policy is overly prescriptive using 'in doing so must' and is not consistent with the Ministry for the Environment guidance on the NPS- FM, which</p>	<p>Work with territorial authorities to clarify roles and functions and develop a policy that is achievable.</p> <p>Amend policy to read:</p> <p>"District plans shall include objectives, policies, and methods including rules, that give effect to Te Mana o te Wai and section 3.5(4) of the NPS- FM, and in doing so must where relevant and practicable: ..."</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								identifies that: "The NPS-FM 2020 does not provide specific directions about what approaches territorial authorities should use to manage the effects of land use and development on freshwater in district plans. The approach provides flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district"		
S102.047	Te Tumu Paeroa Office of the Māori Trustee			S102.047	Te Tumu Paeroa Office of the Māori Trustee	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Partially supports Policy FW.3. However, to give effect to the relationship mana whenua / tangata whenua have, provision (c) needs to be more directive to preclude ambiguity within the policy.	Amend Policy FW.3 clause (c) as follows: (c) Recognise and provide for mana whenua / tangata whenua and their relationship with their culture, land, water, wāhi tapu and other taonga;	Accept
S113.017	Wellington Water			S113.017	Wellington Water	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	This policy is reliant on the definition of hydrological controls, which is a very unclear definition. Clarity would be improved by adding the suggested wording to these this clause.	Add the following to subclause FW.3(m): Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;	Reject
S113.017	Wellington Water	FS13.021	Wellington City Council	FS13.021	Wellington City Council		Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow	Reject
S113.026	Wellington Water			S113.026	Wellington Water	Policy FW.3: Urban development effects on freshwater and the coastal marine	Support in part	Developments need to also consider the expectations of the stormwater management strategy and plan	Amend clause (h) as follows: (h) Consider the use and development of land in relation to target attribute states and any limits set in a regional plan and the outcomes sought in an	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						area - district plans			approved stormwater management strategy or plan;	
S115.045	Hutt City Council			S115.045	Hutt City Council	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	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.	Accept in part
S118.011	Peka Peka Farm Limited			S118.011	Peka Peka Farm Limited	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Policy FW.3 is directive to district plans, requiring them to give effect to Te Mana o te Wai and section 3.5(4) of the NPS-FM. In doing so, the policy specifies 17 requirements, many of which lack clarity and are uncertain. This range of matters makes the policy cumbersome and difficult to interpret. Supports the intent of the policy but seeks that the drafting of the policy be improved, including by removing any unnecessary duplication of the NPS-FM or other RPS policies.	Amend Policy FW.3 to address the relief sought in the submission.	Accept in part
S131.069	Ātiawa ki Whakarongotai Charitable Trust			S131.069	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Ātiawa supports reference to Te Mana o te Wai, and that district plans must include objectives, policies, and methods (including rules) that give effect to Te Mana o te Wai. Ātiawa is pleased that particular consideration has been given to partnering with mana whenua, Māori freshwater values (including mahinga kai) and other values, providing for a ki uta ki tai approach, and the use of mātauranga Māori.	Retain as notified.	Accept in part

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S131.069	Ātiawa ki Whakarongotai Charitable Trust	FS29.339	Ngā Hapu o Otaki	FS29.339	Ngā Hapu o Otaki		Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept in part

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S135.006	Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/ Stebbings Farmlands Ltd			S135.006	Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/ Stebbings Farmlands Ltd	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	This policy is very broad and seeks to give effects to the NPS Freshwater Management but is unnecessary as the Natural Resources Plan already contains new rules about discharges of stormwater from new urban areas and is already effectively managed. An additional policy is over-kill and unnecessary to achieve outcomes already being achieved through other means.	Delete Policy FW.3	Reject
S140.046	Wellington City Council (WCC)			S140.046	Wellington City Council (WCC)	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	WCC acknowledges its responsibilities under the NPS-FM 2020 as set out by section 3.5(4). However, some of the provisions being required by district plans are outside the scope of s30 of the RMA: <ul style="list-style-type: none"> Vegetation clearance and earthworks in the riparian margin has a direct effect on the water quality of the waterbody, therefore the land use and subsequent discharge of sediment laden material should be 	Amend Policy FW.3 as following: ... (k) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;(l) Require riparian buffers for all waterbodies and avoid piping of rivers; (m) Require hydrological controls to avoid adverse effects of runoff quantity (flows and	Accept

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								<p>managed by Regional Council. Otherwise, development would need to go to the relevant territorial authority for the s9 consent and then to GWRC for the s15 discharge consent. This would not promote integrated management.</p> <ul style="list-style-type: none"> • The effects of the development on drinking water sources should be managed by Regional Council with the identification of Drinking Protection Zones and relevant requirements for discharge consents. • The piping of rivers is a s13 matter that should be managed by Regional Council. • Water efficiency is also managed by Regional Council under s14 of the RMA and is unclear how s9 would have any influence on water use. 	<p>volumes) and maintain, to the extent practicable, natural stream flows;(n) Require efficient use of water;</p> <p>(o) Manage land use and development in a way that will minimise the generation of contaminants, including building materials, and the extent of impervious surfaces;</p> <p>(p) Consider daylighting of streams, where practicable; and</p> <p>(q) Consider the effects of land use and development on drinking water sources...</p>	
S140.046	Wellington City Council (WCC)	FS19.058	Wellington Water Ltd ("Wellington Water")	FS19.058	Wellington Water Ltd ("Wellington Water")		Oppose	FW.3 should be retained with changes as per Wellington Water's primary submission.	Disallow	Accept in part
S140.046	Wellington City Council (WCC)	FS14.040	Masterton District Council	FS14.040	Masterton District Council		Support in part	<p>Agree with WCC that:</p> <ul style="list-style-type: none"> • Vegetation clearance and earthworks in the riparian margin has a direct effect on the water quality of the waterbody, therefore the land use and subsequent discharge of sediment laden material should be managed by Regional Council. Otherwise, development would need to go to the relevant territorial authority for the s9 consent and then toGWRC for the s15 discharge consent. This would not promote integrated management. 	<p>Not stated</p> <p>Agree with points made by WCC regarding regional council responsibilities.</p>	Accept in part

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								<ul style="list-style-type: none"> • The effects of the development on drinking water sources should be managed by Regional Council with the identification of Drinking Protection Zones and relevant requirements for discharge consents. • The piping of rivers is a s13 matter that should be managed by Regional Council. Water efficiency is also managed by Regional Council under s14 of the RMA and is unclear how s9 would have any influence on water use. 		
S147.016	Wellington Fish and Game Council			S147.016	Wellington Fish and Game Council	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>Strongly support the inclusion of new Policy FW.3 to give effect to the NPS-FM.</p> <p>However, as drafted proposed new Policy FW.3 does not give proper effect to:</p> <ul style="list-style-type: none"> • Policies 6 and 7 of the NPS-FM, regarding the protection of river extent and values and natural inland wetlands; and • Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout and salmon. <p>The suggested amendments are intended to address this deficiency.</p>	Amend. (k) Require that urban development is located and designed to avoid the loss of river extent and values and natural inland wetlands, and to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;"	Reject
S147.016	Wellington Fish and Game Council	FS19.080	Wellington Water Ltd ("Wellington Water")	FS19.080	Wellington Water Ltd ("Wellington Water")		Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p>	Disallow	Accept

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								<p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>		
S147.016	Wellington Fish and Game Council	FS30.185	Beef + Lamb New Zealand Ltd	FS30.185	Beef + Lamb New Zealand Ltd		Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.017	Wellington Fish and Game Council			S147.017	Wellington Fish and Game Council	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>Strongly support the inclusion of new Policy FW.3 to give effect to the NPS-FM.</p> <p>However, as drafted proposed new Policy FW.3 does not give proper effect to:</p> <ul style="list-style-type: none"> • Policies 6 and 7 of the NPS-FM, regarding the protection of river extent and values and natural inland wetlands; and • Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout and salmon. <p>The suggested amendments are intended to address this deficiency.</p>	New subclause:(ka) Require that urban development is located and designed to protect the habitats of indigenous freshwater species, trout and salmon;	Reject
S147.017	Wellington Fish and Game Council	FS20.113	Ātiawa ki Whakarongotai Charitable Trust	FS20.113	Ātiawa ki Whakarongotai Charitable Trust		Oppose	<p>Ātiawa do not support the relief sought where it relates to protecting habitats of trout and salmon without any proviso. Ātiawa refer to Policy 9 and Policy 10 of the NPS-FM to support this statement, which affords indigenous freshwater species greater protection than trout and salmon. Additionally, Ātiawa do not support the protection of trout and salmon which have adverse impacts on indigenous ecosystems. Generally the management and decision making in regards to trout and salmon species has not been undertaken within a Treaty Partnership with mana whenua. To accept the relief sought by the submitter would be contrary to Te Tiriti o Waitangi and the national resource management direction.</p>	Disallow Disallow the relief sought in so far as it relates to the protection of trout and salmon.	Accept

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S147.017	Wellington Fish and Game Council	FS19.081	Wellington Water Ltd ("Wellington Water")	FS19.081	Wellington Water Ltd ("Wellington Water")		Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept
S147.017	Wellington Fish and Game Council	FS30.186	Beef + Lamb New Zealand Ltd	FS30.186	Beef + Lamb New Zealand Ltd		Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept

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								climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S147.058	Wellington Fish and Game Council			S147.058	Wellington Fish and Game Council	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.	Accept in part
S147.058	Wellington Fish and Game Council	FS19.122	Wellington Water Ltd ("Wellington Water")	FS19.122	Wellington Water Ltd ("Wellington Water")		Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.058	Wellington Fish and Game Council	FS30.227	Beef + Lamb New Zealand Ltd	FS30.227	Beef + Lamb New Zealand Ltd		Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Accept in part
S148.038	Wellington International Airport Ltd (WIAL)			S148.038	Wellington International Airport Ltd (WIAL)	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose in part	WIAL is concerned that this policy has applied the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area. There are separate provisions relating to the management of the coastal environment and coastal marine area in the RPS.	Delete reference to the coastal marine area in this policy and explanation. Ensure it only applies to freshwater and is consistent with the National Policy Statement for Freshwater Management 2020. Otherwise delete the policy.	Accept

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S157.032	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.032	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict</p>	<p>amend subclause.</p> <p>(j) Require that urban development is located and designed to minimise the extent and volume of earthworks to the extent practicable and to follow, to the extent practicable, existing land contours;</p>	Reject

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								<p>requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff</p>		

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								<p>volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		

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S157.033	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.033	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict</p>	<p>amend subclause.</p> <p>(k) Require that urban development is located and designed to reduce the potential for adverse effects on protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</p>	Reject

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								<p>requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff</p>		

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								<p>volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		

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S157.034	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.034	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict</p>	<p>amend subclause</p> <p>(m) Require hydrological controls to avoid reduce adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;</p>	Reject

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								<p>requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff</p>		

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								<p>volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		
S157.034	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS3.026	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.026	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Waka Kotahi supports this submission point due to concerns with the use of the word 'avoid', which provides a strict requirement that is inconsistent with NPS FM.	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S165.055	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.055	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Various amendments are required in order to ensure the direction and ecological bottom-lines from the RMA, NZCPS and NPSFM are carried through.	Amend (g) and (h) as follows: (g) Consider the avoid the adverse effects on freshwater and the coastal marine area of subdivision, use and development of land; (h) Consider control the use and development of land in relation order to achieve target attribute states and comply with any limits set in a regional plan; Amend clause (p) as follows: (p) Consider promote daylighting of streams, where practicable; and	Reject
S165.055	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS17.019	Wellington International Airport Limited ("WIAL")	FS17.019	Wellington International Airport Limited ("WIAL")	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	WIAL oppose the relief sought as it is inconsistent with Part 2 and provisions of the Act, the New Zealand Coastal Policy Statement and other relevant statutory documents.	Disallow	Accept
S165.055	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.077	Ātiawa ki Whakarongotai Charitable Trust	FS20.077	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Ātiawa support the relief sought by Forest and Bird to tighten controls to ensure that NPS-FM is given effect to.	Allow	Reject

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S165.055	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept
S166.058	Masterton District Council			S166.058	Masterton District Council	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose in part	We request clarity on the joint processing of consents (Policy FW.3, Method FW2). In particular: How is this going to work? What will trigger this process? What is the threshold? What does this look like in practice? What does this look like for iwi?	Amend clause (f) to read: (f) Integrate planning and design of stormwater management to achieve multiple improved outcomes - amenity values, recreational, cultural, ecological, climate, vegetation retention; protection of life and property	Reject
S167.085	Taranaki Whānui			S167.085	Taranaki Whānui	Policy FW.3: Urban development effects on freshwater and the	Support in part	Support with stronger partnership with mana whenua. Policy should also be amended to provide for the urban development outcomes detailed within Te Mahere Wai.	Amend clause (c) to read: c) Provide for Partner with mana whenua / tangata whenua and to provide for their relationship with their culture, land, water, wāhi	Accept

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						coastal marine area - district plans		This also needs to provide for coastal marine permits.	tapu and other taonga [Note. This submission point referenced S167.0149]	
S167.085	Taranaki Whānui	FS6.029	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	FS6.029	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	We support this submission because it uses stronger language than the proposed language. Partnership is a more beneficial and tangible way to support mana whenua/ tangata whenua.	Allow	Accept
S168.057	Rangitāne O Wairarapa Inc			S168.057	Rangitāne O Wairarapa Inc	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>Rangitāne o Wairarapa notes that this policy is currently so broadly worded that it applies to all development, not just urban development (except as confined by the policy title). While this does not appear to be the intent, a broader application would be supported by Rangitāne o Wairarapa, as this would more efficient and effective, and more likely to give full effect to the NPS FM.</p> <p>As currently worded, the policy is not strong enough to give effect to the NPS FM in that it only requires 'consideration' of certain matters.</p> <p>Rangitāne o Wairarapa supports a partnership approach with mana whenua /tangata whenua.</p>	<p>To improve the grammatical structure of clause (k) [Note submission may be referencing Clause (i)], for example as follows: 'Require that Water Sensitive Urban Design principles and methods are applied during consideration of subdivision, the extent of impervious surfaces and in the control of stormwater infrastructure and the extent of impervious surfaces;</p> <p>To remove the word 'consider' from clauses i and j and use wording that gives effect to the NPS FM;</p> <p>So that it applies to all development, not just 'urban development' (which is undefined by the plan change), in order to efficiently and effectively achieve integrated management.</p>	Accept in part

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S168.057	Rangitāne O Wairarapa Inc	FS31.167	Sustainable Wairarapa inc	FS31.167	Sustainable Wairarapa inc	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

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								Nga mihi nui Ian Gun		
S169.010	Kahungunu Ki Wairarapa			S169.010	Kahungunu Ki Wairarapa	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified	Accept in part

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S169.010	Kahungunu Ki Wairarapa	FS31.011	Sustainable Wairarapa inc	FS31.011	Sustainable Wairarapa inc	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

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								Nga mihi nui Ian Gun		
S170.050	Te Rūnanga o Toa Rangatira			S170.050	Te Rūnanga o Toa Rangatira	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Policy FW.3 Implementing Te Mana o Te Wai in urban development - consideration is supported; clauses of (i) and (l) can be strengthened by rewording. Instead of minimising earthworks extent and volume of works, this could mean to say performing earthworks, will need to be justified as to when they are absolutely needed. Identifying and mapping streams also need to be done as part of the stormwater and related-infrastructure investigations, that are attached to the consent application. This consideration could be strengthened to say no negative impact will occur in the identified and mapped streams.	Strengthen the wording of the provisions. In place of 'minimising' this could say 'performing earthworks, will need to be justified as to when they are absolutely needed'. Identifying and mapping streams must be required as part of the stormwater and related-infrastructure investigations attached to the consent application. Strengthen this provision to say no negative impact will occur in the identified and mapped streams.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S170.050	Te Rūnanga o Toa Rangatira	FS29.164	Ngā Hapu o Otaki	FS29.164	Ngā Hapu o Otaki	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		

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S170.085	Te Rūnanga o Toa Rangatira			S170.085	Te Rūnanga o Toa Rangatira	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>The wording of Policy FW.1 clause (b) takes away from the strength this Policy is anchored on. This could be rewritten to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.</p> <p>The clause (c) is using the word 'minimise' which does not have teeth when it comes to rules in the district plans, and their implementation. This clause caveats the land contours and extent practicable; it is unclear what triggers (rules) District Plans would have, this to be implemented.</p> <p>Most of the land is on challenging contours in Wellington and on hills that need to be cut out for feasible development to occur. Any mitigation that might be possible for flatter regions such as, Waikato or Auckland, may not be realisable, possible, or feasible in Greater Wellington.</p> <p>The policy should acknowledge and change the wording to say, if it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place.</p> <p>In summary, the policy contradicts itself because minimising earthworks in Wellington may not be able to be an option in some instances due to topography and soil conditions.</p> <p>The drafting intent of Policy FW.1 (f) is optimistic to reflect achieving</p>	<p>Rewrite Policy FW.1 clause (b) to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.</p> <p>Use stronger wording than 'minimise' in clause (c) and ensure the policy is worded in a way that the District Plan rules which flow on from this provision can be implemented. E.g. it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place. Ensure the provision is workable given the topographical and geological context.</p> <p>Ensure there are stormwater-basics and bottom lines, the 'musts of stormwater management and land development' are captured in this policy. If these are first achieved then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention.</p> <p>The policy also needs to acknowledge the need of additional infrastructure and provides for safe and clever solutions for communities.</p>	Reject

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								<p>multiple gains for stormwater management. In our built / urban environments, we observe the multiple issues of our stormwater network which won't be able to achieve the intent of this Policy.</p> <p>The policy should ensure there are stormwater-basics and bottom lines are achieved- not compromised then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention. The policy should focus on absolute musts of stormwater management and land development and acknowledge in the absence of standards and bottom lines, delivering other aspects may be a luxury. The policy needs to ensure the stormwater system provides safe and clever solutions to our communities then the rest, multiple positive outcomes, will come.</p> <p>The policy also needs to acknowledge the need of additional infrastructure to be able to give effect to this Policy.</p>		

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S170.085	Te Rūnanga o Toa Rangatira	FS29.199	Ngā Hapu o Otaki	FS29.199	Ngā Hapu o Otaki	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

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								<p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		
S11.015	Outdoor Bliss Heather Blissett			S11.015	Outdoor Bliss Heather Blissett	Policy FW.4: Financial contributions for urban development - district plans	Support in part	I would like to see incentives that make an impact	Implement incentives that make an impact such as costs to the developer being greater if not using sustainable practice	Reject

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S16.081	Kāpiti Coast District Council			S16.081	Kāpiti Coast District Council	Policy FW.4: Financial contributions for urban development - district plans	Support in part	This policy is helpful in supporting the inclusion of financial contributions in the district plan, particularly those proposed under section 80E(1)(b)(i) of the RMA. However, the policy includes unnecessary text which we seek be removed.	Amend as follows: Policy FW.4: Financial contributions for urban development - district plans District plans shall include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent where off site stormwater quality and quantity treatment is required, as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose. Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence Explanation Policy FW.4 requires financial contributions, or alternatively development contributions to be collected for the construction of catchment scale stormwater solutions, so that urban new urban development pays their fair share.	Reject

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S25.026	Carterton District Council			S25.026	Carterton District Council	Policy FW.4: Financial contributions for urban development - district plans	Oppose	CDC opposes this policy and considers that the RPS should not include policies that dictate requirements for particular financial contributions in district plans. The appropriate mechanism for GWRC to suggest such a policy is via the Schedule 1 process for the Wairarapa Combined District Plan.	Delete this policy.	Accept
S30.046	Porirua City Council			S30.046	Porirua City Council	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>Council does not use financial contributions as a regulatory tool in our district plan as they are inefficient, and they duplicate our existing approach of requiring development contributions and developer agreements administered under the Local Government Act.</p> <p>The policy needs to be reworded as it lacks the necessary precision to enable its meaningful implementation.</p> <p>The advice note should be deleted as it is incorrect, we are unaware of where in the RMA these Government departments are exempt from paying financial contributions.</p> <p>The explanation note also does not provide much value.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows:</p> <p>Except where required through a Development Contributions Policy, District plans shall include policies and rules that require the payment of financial contributions for the provision of off-site stormwater quality and quantity treatment, where that treatment is identified in a financial contributions to be applied to subdivision and development as a condition of the resource consent where off site stormwater quality and quantity treatment is required, as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									development for the same purpose. Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence. Explanation Policy FW.4 requires financial contributions, or alternatively development contributions to be collected for the construction of catchment scale stormwater solutions, so that new urban development pays their fair share.	
S30.046	Porirua City Council	FS25.079	Peka Peka Farm Limited	FS25.079	Peka Peka Farm Limited	Policy FW.4: Financial contributions for urban development - district plans	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Reject
S34.057	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.057	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy FW.4: Financial contributions for urban development - district plans	Support in part	<p>Council supports the intent to fund stormwater infrastructure but does not consider that it is appropriate to 'require' that financial contributions are used as a mechanism for this.</p> <p>It is also unclear how territorial authorities are expected to determine how a fair share of the cost is determined or how this links to other local authority funding processes such as the long-term plan. It should be for the local authority to determine the most appropriate funding mechanism.</p> <p>We note that network discharge consents are also a function of the regional council.</p>	Amend to read: "District plans shall may include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent, particularly where off site stormwater quality and quantity treatment is required., as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								There appears to be an issue here where territorial authorities are required to apply for a discharge consent but then are also required to collect financial contributions.	where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose."	
S78.011	Beef + Lamb New Zealand Limited			S78.011	Beef + Lamb New Zealand Limited	Policy FW.4: Financial contributions for urban development - district plans	Not Stated / Neutral	Accepts that proposed Policy FW.4 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified	Reject
S78.011	Beef + Lamb New Zealand Limited	FS20.319	Ātiawa ki Whakarongotai Charitable Trust	FS20.319	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.4: Financial contributions for urban development - district plans	Oppose	Ātiawa oppose the entire submission by Beef + Lamb New Zealand Limited. The relief sought by Beef + Lamb is to withdraw all proposed amendments, apart from those which give effect to NPS-UD. The basis for deleting the proposed amendments (apart from NPS-UD provisions) is to delay decision-making until further national direction is gazetted or until the scheduled full review of the RPS. Ātiawa do not accept that delaying proposed RPS Change 1 is an appropriate course of action, further delays would permit further degradation of te taiao and continue to have perverse outcomes for mana whenua.	Disallow Disallow the relief sought where the submitter seeks the deletion of proposed amendments.	Accept in part
S79.033	South Wairarapa District Council			S79.033	South Wairarapa District Council	Policy FW.4: Financial contributions for urban development - district plans	Oppose	It is unclear why the RPS is in this space. The policy is difficult to read and in parts does not make sense. Similarly, the provision as written may not meet the necessary requirements to be implemented.	Delete	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S115.046	Hutt City Council			S115.046	Hutt City Council	Policy FW.4: Financial contributions for urban development - district plans	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 Policy FW.4	Accept
S115.046	Hutt City Council	FS13.022	Wellington City Council	FS13.022	Wellington City Council	Policy FW.4: Financial contributions for urban development - district plans	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow	Accept
S129.019	Waka Kotahi NZ Transport Agency			S129.019	Waka Kotahi NZ Transport Agency	Policy FW.4: Financial contributions for urban development - district plans	Support	Supports the Regional Council providing direction to territorial authorities to receive Financial Contributions to manage actual effects.	Retain as notified.	Reject
S129.019	Waka Kotahi NZ Transport Agency	FS14.035	Masterton District Council	FS14.035	Masterton District Council	Policy FW.4: Financial contributions for urban development - district plans	Support	<p>Agree with</p> <p>Supports the Regional Council providing direction to territorial authorities to receive Financial</p>	<p>Not stated</p> <p>Agree with relief sought: Retain as notified.</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Contributions to manage actual effects		
S131.070	Ātiawa ki Whakarongotai Charitable Trust			S131.070	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.4: Financial contributions for urban development - district plans	Support in part		Ātiawa support financial contributions to be applied to subdivision and development to mitigate the management of offsite stormwater quality and quantity treatment is required	Reject
S131.070	Ātiawa ki Whakarongotai Charitable Trust	FS29.340	Ngā Hapu o Otaki	FS29.340	Ngā Hapu o Otaki	Policy FW.4: Financial contributions for urban development - district plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S135.007	Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/ Stebbings Farmlands Ltd			S135.007	Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/ Stebbings Farmlands Ltd	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>Developers are already providing stormwater neutrality for their developments and treatment in accordance with WWL guidelines and these are ensured through consent conditions. They are also paying development contributions for stormwater on a catchment and city-wide basis in Wellington and WWL also need to lead by example to attenuate and treat their stormwater within existing urban environments rather than single out new land developments. The policy is not clear</p>	Delete Policy FW.4	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								about what constitutes off-site and is ambiguous.		
S140.047	Wellington City Council (WCC)			S140.047	Wellington City Council (WCC)	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>The question of how to fund stormwater management measures is 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 and development contributions. Territorial authorities also have other funding options, such as using general revenues or targeted rates.</p> <p>It is also unclear what type of development this policy would apply to and how the management of the system post construction factors into when financial contributions apply. There are also a number of issues with this policy as drafted, including the lack of a definition for "fair share". It will also be difficult to adequately apply financial contributions to permitted activities</p>	Delete Policy FW.4 OR Move Policy FW.4 to be a consideration policy and clarify whether the management of the new system will then fall to the Territorial Authority or not.	Accept
S147.059	Wellington Fish and Game Council			S147.059	Wellington Fish and Game Council	Policy FW.4: Financial contributions for urban development - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.	Reject
S147.059	Wellington Fish and Game Council	FS19.123	Wellington Water Ltd ("Wellington Water")	FS19.123	Wellington Water Ltd ("Wellington Water")	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately</p>	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>		
S147.059	Wellington Fish and Game Council	FS30.228	Beef + Lamb New Zealand Ltd	FS30.228	Beef + Lamb New Zealand Ltd	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S158.022	Kāinga Ora Homes and Communities			S158.022	Kāinga Ora Homes and Communities	Policy FW.4: Financial contributions for urban development - district plans	Oppose in part	Recognise the need for financial contributions, consider that financial contributions for stormwater mitigation should be limited to the effects at point of connection for a development allotment. In addition, alternative solutions for stormwater treatment should be provided for to manage quality and quantity of stormwater within a development, which would then offset the payment of financial contributions.	Amend Policy FW.4 as follows: District plans shall may include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent for effects associated with stormwater quality and quantity treatment at the point of connection to the development only where off site is required, as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose. A financial contribution will not be required where on site stormwater quantity and quality mitigation is provided to an adequate level to reduce downstream effects. Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence	Reject
S158.022	Kāinga Ora Homes and Communities	FS16.004	Stride Investment Management Limited	FS16.004	Stride Investment Management Limited	Policy FW.4: Reducing water demand - district plans	Support	It is inappropriate and unnecessary for the RPS to require district plans to require financial contributions to be paid for stormwater mitigation. The	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								territorial authority should retain discretion to undertake an assessment.		
S166.059	Masterton District Council			S166.059	Masterton District Council	Policy FW.4: Financial contributions for urban development - district plans	Support	Acknowledge that this policy is important for future planning.	Retain as notified.	Reject
S167.086	Taranaki Whānui			S167.086	Taranaki Whānui	Policy FW.4: Financial contributions for urban development - district plans	Support in part	Financial contributions cannot be imposed against iwi authorities	Amend the Note section to read: Note: financial contributions cannot be imposed against iwi authorities , Minister of Education or Minister of Defence	Reject
S168.058	Rangitāne O Wairarapa Inc			S168.058	Rangitāne O Wairarapa Inc	Policy FW.4: Financial contributions for urban development - district plans	Support in part	Rangitāne o Wairarapa support seeking financial contributions for stormwater networks, where onsite treatment cannot be achieved. Our preference, however, is that wherever possible, Stormwater Management Plans should be required to be developed and implemented to ensure adverse effects on the environment, including any cumulative effects, are prevented, or minimised by onsite measures, rather than passing on this responsibility to others. Stormwater Management Plans should give effect to Te Mana o te Wai and prioritise the health and wellbeing of the wai first and foremost, rather than social or economic gain.	Amend the policy title to remove the word 'urban' . Amend the explanatory text to note the need for any Stormwater Management Plan to give effect to Te Mana o te Wai, which means that on-site solutions should be implemented wherever feasible, and that financial contributions for offsite solutions are only to be taken where this cannot be achieved.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.058	Rangitāne O Wairarapa Inc	FS31.168	Sustainable Wairarapa inc	FS31.168	Sustainable Wairarapa inc	Policy FW.4: Financial contributions for urban development - district plans	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Nga mihi nui Ian Gun		
S170.028	Te Rūnanga o Toa Rangatira			S170.028	Te Rūnanga o Toa Rangatira	Policy FW.4: Financial contributions for urban development - district plans	Support in part	<p>Developers are required to make financial contributions to subdivision and development as a condition of their consent, ensuring that there is treatment for stormwater. It is commonly mentioned that these contributions have not been enough in the past and can only deliver less than ideal systems when it comes to stormwater systems.</p> <p>We are aware that Councils are geared up for reviewing their Financial Contribution policies as to identify what constitutes a 'fair contribution'. This policy could be reworded; instead of 'how a fair share of the cost is determined, and the nature of the contribution' it could focus on a realistic calculation of proposed development's greater connection with the current and existing infrastructure as well as the burden that it will lay on this infrastructure. It is unproductive for development contributions to just focus on the site-based stormwater systems instead of looking at the whole system and its connections.</p>	This policy could be reworded; instead of 'how a fair share of the cost is determined, and the nature of the contribution' it could focus on a realistic calculation of proposed development's greater connection with the current and existing infrastructure as well as the burden that it will lay on this infrastructure.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								We have seen yet again many examples in Porirua, a development does not just have impacts where it is located but need to be considered within its overall downstream and upstream environments in the whole catchment and the infrastructure associated with it. We currently do not have well established systems to cope with existing loads regarding stormwater and wastewater overflows, let alone the needs of new subdivisions and development.		
S170.028	Te Rūnanga o Toa Rangatira	FS29.142	Ngā Hapu o Otaki	FS29.142	Ngā Hapu o Otaki	Policy FW.4: Financial contributions for urban development - district plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S11.007	Outdoor Bliss Heather Blissett			S11.007	Outdoor Bliss Heather Blissett	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Needs to be essential	Amend as follows: Protecting and enhancing the health and wellbeing of water bodies and freshwater ecosystems - consideration essential	Reject
S16.051	Kāpiti Coast District Council			S16.051	Kāpiti Coast District Council	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Council supports the policy and the matters to be considered by the regional council for regional consents. We note the matters align with the functions of regional councils and appropriately address the NPS- FM matters that fall within the jurisdiction, resourcing, skills and role of regional councils under the RMA and NPS-FM.	Retain.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.064	Porirua City Council			S30.064	Porirua City Council	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	<p>Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions.</p> <p>Clause (d) duplicates (a) and (b).</p>	<p>Amend policy as follows:</p> <p>When considering an application for a regional resource consent, particular regard shall be given to:</p> <p>(a) that water quality, flows and water levels and aquatic habitats of water bodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of waterbodies and the health and wellbeing of freshwater ecosystems;</p> <p>(b) that, as a minimum, water quality in the coastal marine area is managed in a way that protects and enhances the health and well-being of waterbodies and the health and wellbeing of marine ecosystems:</p> <p>(c) providing for mana whenua / tangata whenua values, including mahinga kai;(d) maintaining or enhancing the functioning of ecosystems in the water body;</p> <p>(e) maintaining or enhancing the ecological functions of riparian margins;</p> <p>(f) minimising the effect of the proposal on groundwater recharge areas that are connected to surface water bodies;</p> <p>(g) maintaining or enhancing the amenity and recreational values of rivers and lakes, including those with significant values listed</p>	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									<p>in Table 15 of Appendix 1;</p> <p>(h) 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;</p> <p>(i) maintaining natural flow regimes required to support aquatic ecosystem health;</p> <p>(j) maintaining or enhancing space for rivers to undertake their natural processes;</p> <p>(k) maintaining fish passage;</p> <p>(l) protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning;</p> <p>(m) restricting stock access to estuaries rivers, lakes and wetlands; and avoiding the removal or destruction of indigenous wetland plants in wetlands.</p>	
S30.064	Porirua City Council	FS25.097	Peka Peka Farm Limited	FS25.097	Peka Peka Farm Limited	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.064	Porirua City Council	FS26.057	Meridian Energy Limited	FS26.057	Meridian Energy Limited	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Porirua CC requests clarification that Policy 40 only applies to applications to GWRC that fall with GWRC's s. 30 RMA functions. Meridian agrees that the amendment is necessary to retain the stated scope of the policy.	Allow	Accept
S32.022	Director-General of Conservation			S32.022	Director-General of Conservation	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	The proposed changes are appropriate in giving effect to the NPSFM 2020 and the NZCPS 2010. However, the first two subclauses require amendment so that they provide direction and not just a statement.	Retain as notified, except for the following changes: "(a)ensuring that..." "(b)ensuring that..."	Reject
S32.022	Director-General of Conservation	FS20.016	Ātiawa ki Whakarongotai Charitable Trust	FS20.016	Ātiawa ki Whakarongotai Charitable Trust	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Ātiawa support strengthening provisions to ensure that the health and well-being of water bodies and freshwater ecosystems are protected and enhanced.	Allow	Reject
S32.022	Director-General of Conservation	FS30.300	Beef + Lamb New Zealand Ltd	FS30.300	Beef + Lamb New Zealand Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the	Disallow	Reject

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								changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S34.062	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.062	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Support changes since the exposure draft, to refer to regional consents only. However, the change from 'maintain' to 'protect' is significant, as well as the change in verbs from 'discourage' to 'restrict' and 'avoid' and the need to 'restore'.	Planning and legal review of the verbs to ensure this is feasibly able to be achieved. Amend the Section 32 Assessment to adequately assess this significant difference in policy direction.	Accept in part
S34.062	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	FS28.060	Horticulture New Zealand	FS28.060	Horticulture New Zealand	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	HortNZ support review of the policy to ensure it can feasibl be achieved	Allow	Accept in part
S79.042	South Wairarapa District Council			S79.042	South Wairarapa District Council	Policy 40: Protecting and enhancing the health and well-being of water bodies	Support in part	This is a value that is included in the proposed PC1 framework that is absent in the decision making in Policy 40. This water has significant value ot the community and should also be protected when considering	Amend Policy 40 to recognise the need for water to support human health. Or, similar relief to the same effect; AND;	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						and freshwater ecosystems - consideration		resource consents. Policy FW.5 does not achieve this in its current form.	Any consequential amendments to give effect to the relief sought	
S100.019	Meridian Energy Limited			S100.019	Meridian Energy Limited	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	The focus of Policy 40 should be on the significant values of the rivers and lakes. If changing the text in relation to wetlands, the opportunity should be taken to correct the expression to 'natural wetlands'.	Amend clause (h) as follows (or similar): When considering an application for a regional resource consent, particular regard shall be given to: (a) ... (b) ... (c) ... (d) ... (e) ... (f) ... (g) ... (h) protecting the values of rivers and lakes that have significant indigenous ecosystems and aquatic habitats with significant indigenous biodiversity values of rivers and lakes, including those listed in Table 16 of Appendix 1; (m) discouraging restricting stock access to estuaries rivers, lakes and natural wetlands; and (n) discouraging avoiding the	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									removal or destruction of indigenous wetland plants in natural wetlands.	
S113.030	Wellington Water			S113.030	Wellington Water	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Clauses (f) and (i) lack clarity.	Amend clause (f) (f) Minimising the effect of the proposals such as gravel extraction, exploratory drilling, flood protection and works in the beds of lakes and rivers on groundwater recharge areas that are connected to surface water bodies (i) Maintaining natural flushing flow regimes required to support aquatic ecosystem health	Accept in part
S114.004	Fulton Hogan Ltd			S114.004	Fulton Hogan Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies	Support in part	Clause h) is not clearly phrased, it is recommended that this clause be re-worded to clarify its intent.	(h) protecting the significant indigenous ecosystems and habitats of rivers and lakes with significant indigenous biodiversity values of rivers and lakes,	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						and freshwater ecosystems - consideration			including those listed in Table 16 of Appendix 1;	
S115.065	Hutt City Council			S115.065	Hutt City Council	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Not Stated / Neutral	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.	Reject
S128.041	Horticulture New Zealand			S128.041	Horticulture New Zealand	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	The considerations are generally consistent with the NPSFM direction.	Retain as notified	Accept in part
S131.089	Ātiawa ki Whakarongotai Charitable Trust			S131.089	Ātiawa ki Whakarongotai Charitable Trust	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	While Ātiawa supports the protection and enhancement of the health and well-being of water bodies and freshwater ecosystems, Ātiawa is concerned that this policy applies only to regional consents. Ātiawa seeks that this policy apply where relevant to district consents. When viewing the natural environment through an integrated lens, which is a widely acknowledged and accepted principle, the effects of land use effect other parts of the natural environment. That is, what occurs on the land, if poorly management can have poor outcomes for water, biodiversity, and the ecosystem. An integrated	Policy 40: Protecting and enhancing the health and wellbeing of water bodies and freshwater ecosystems - consideration When considering an application for a regional resource consent, particular regard shall be given to:	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								approach to resource management is a key aspect of RPS Change 1, as it is currently drafted this policy does not align with this approach. Ātiawa does not propose to address responsibilities of regional and local authorities, rather to address at a high level that all freshwater management must (whether direct or indirect) must be managed in a way that gives effect to the NPS-FM, including Te Mana o te Wai.		
S131.089	Ātiawa ki Whakarongotai Charitable Trust	FS29.359	Ngā Hapu o Otaki	FS29.359	Ngā Hapu o Otaki	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S133.011	Muaūpoko Tribal Authority			S133.011	Muaūpoko Tribal Authority	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S133.011	Muaūpoko Tribal Authority	FS20.358	Ātiawa ki Whakarongotai Charitable Trust	FS20.358	Ātiawa ki Whakarongotai Charitable Trust	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	<p>Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from</p>	<p>Disallow</p> <p>Disallow the whole submission</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.		
S134.015	Powerco Limited			S134.015	Powerco Limited	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting	Amend Policy 40 to recognise that enhancement of waterbodies and freshwater ecosystems may not be necessary or practicable in allcases and that the policy focus is on the quality of fresh water rather thancoastal water. This could be achieved by making changes along the followinglines: "Policy 40: Maintaining Protecting and enhancing the healthand well-being of water bodies and freshwater ecosystems - consideration When considering anapplication for a regional resource consent, particular regard shall be givento: (a) thatwater quality, flows and water levels and aquatic habitats of waterbodies are managed in a way that gives effect to Te Mana o Te Wai and protectsand	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	enhances the health and well-being of waterbodies and the health and wellbeing of freshwater ecosystems; (b) that, requiring as a minimum, water quality in the coastal marine area is to be managed in away that protects and enhances the health and well-being of waterbodies and the health and wellbeing of marine ecosystems.: ..."	
S134.015	Powerco Limited	FS11.019	Fulton Hogan Limited	FS11.019	Fulton Hogan Limited	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	A requirement to enhance as well as protect the health and well-being of freshwater ecosystems in all situations is overly onerous. In practice, to be consistent with this policy all resource consent applications that relate to freshwater ecosystems will need to demonstrate that the proposed activity is not only protecting the water-body, but resulting in an overall improvement.	Allow	Reject
S134.015	Powerco Limited	FS3.037	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.037	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Waka Kotahi supports this submission point and has concerns with the implementation requirements of the words "protect and enhance".	Allow	Reject
S140.067	Wellington City Council (WCC)			S140.067	Wellington City Council (WCC)	Policy 40: Protecting and enhancing the health and well-being of water bodies and	Support	Support as proposed.	Retain as notified.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						freshwater ecosystems - consideration				
S144.040	Sustainable Wairarapa Inc			S144.040	Sustainable Wairarapa Inc	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Protecting freshwater will be an essential part of using nature-based solutions for water resilience and adapting to climate change. In particular, protecting groundwater recharge areas and giving rivers more space and improving their natural character will be needed.	Retain as notified.	Accept in part
S147.009	Wellington Fish and Game Council			S147.009	Wellington Fish and Game Council	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM. The proposed amendments are necessary to give effect to Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.	Insert new subclause in Policy 40 as follows: (fa) avoiding the loss of river extent and values;	Accept in part
S147.009	Wellington Fish and Game Council	FS28.061	Horticulture New Zealand	FS28.061	Horticulture New Zealand	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	The relief sought does not align with the policy direction in the NPSFM (which includes 'where practicable')	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.009	Wellington Fish and Game Council	FS19.073	Wellington Water Ltd ("Wellington Water")	FS19.073	Wellington Water Ltd ("Wellington Water")	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Reject
S147.009	Wellington Fish and Game Council	FS30.178	Beef + Lamb New Zealand Ltd	FS30.178	Beef + Lamb New Zealand Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S147.010	Wellington Fish and Game Council			S147.010	Wellington Fish and Game Council	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM. The proposed amendments are necessary to give effect to Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.	Insert new subclause in Policy 40 as follows: (ha) protecting the habitats of indigenous freshwater species, trout and salmon;	Accept in part
S147.010	Wellington Fish and Game Council	FS28.062	Horticulture New Zealand	FS28.062	Horticulture New Zealand	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	The relief sought conflicts with the policy direction in the NPSFM	Disallow	Accept in part
S147.010	Wellington Fish and Game Council	FS20.110	Ātiawa ki Whakarongotai Charitable Trust	FS20.110	Ātiawa ki Whakarongotai Charitable Trust	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Ātiawa do not support the relief sought where it relates to protecting habitats of trout and salmon without any proviso. Ātiawa refer to Policy 9 and Policy 10 of the NPS-FM to support this statement, which affords indigenous freshwater species greater protection than trout and salmon. Additionally, Ātiawa do not support the protection of trout and salmon which have adverse impacts on indigenous ecosystems. Generally the management and decision making in	Disallow Disallow the relief sought in so far as it relates to the protection of trout and salmon.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject	
								regards to trout and salmon species has not been undertaken within a Treaty Partnership with mana whenua. To accept the relief sought by the submitter would be contrary to Te Tiriti o Waitangi and the national resource management direction.			
S147.010	Wellington Fish and Game Council	FS19.074	Wellington Water Ltd ("Wellington Water")	FS19.074	Wellington Water Ltd ("Wellington Water")	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Reject	
S147.010	Wellington Fish and Game Council	FS30.179	Beef + Lamb New Zealand Ltd	FS30.179	Beef + Lamb New Zealand Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural</p>	Disallow	That the submission be disallowed with the exception of 147.007	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S147.011	Wellington Fish and Game Council			S147.011	Wellington Fish and Game Council	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM. The proposed amendments are necessary to give effect to Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.	Insert new subclause in Policy 40 as follows: (ma) ensuring that there is no further loss of natural inland wetlands and their values are protected;	Accept in part
S147.011	Wellington Fish and Game Council	FS28.063	Horticulture New Zealand	FS28.063	Horticulture New Zealand	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	The relief sought conflicts with the policy direction in the NPSFM	Disallow	Accept in part
S147.011	Wellington Fish and Game Council	FS20.122	Ātiawa ki Whakarongotai Charitable Trust	FS20.122	Ātiawa ki Whakarongotai Charitable Trust	Policy 40: Protecting and enhancing the health and well-being of water bodies	Support in part	Ātiawa support and encourage provisions that would result in protection of natural inland wetlands.	Allow in part Allow in part the submission point in so far as it relates to the protection of natural inland wetlands. Ātiawa seek further	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						and freshwater ecosystems - consideration			clarification of what values are sought to be protected by this submission point, until this is clarified Ātiawa do not support reference to other values.	
S147.011	Wellington Fish and Game Council	FS19.075	Wellington Water Ltd ("Wellington Water")	FS19.075	Wellington Water Ltd ("Wellington Water")	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Reject
S147.011	Wellington Fish and Game Council	FS30.180	Beef + Lamb New Zealand Ltd	FS30.180	Beef + Lamb New Zealand Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S157.018	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.018	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	Amend Policy 40 to recognise that enhancement of water bodies and freshwater ecosystems may not be necessary or practicable in all cases and that the policy focus is on the quality of fresh water rather than coastal water. This could be achieved by making changes along the following lines: Policy 40: Maintaining Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S157.018	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS26.056	Meridian Energy Limited	FS26.056	Meridian Energy Limited	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose in part	The Fuel Companies(p. 9) request replacement of 'protecting' 'maintaining' and request retention of 'enhancing'. Meridian's own submission opposes enhancement in all situations and requests enhancement 'where appropriate'.	Allow in part Allow to the extent that any amendments are consistent with Meridian's own requested relief.	Reject
S157.019	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.019	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	Amend Policy 40 to recognise that enhancement of water bodies and freshwater ecosystems may not be necessary or practicable in all cases and that the policy focus is on the quality of fresh water rather than coastal water.(a) that water quality, flows and water levels and aquatic habitats of water bodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of waterbodies and the health and wellbeing of freshwater ecosystems;	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S157.020	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.020	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	Delete subclause (b) as follows:(b) that, requiring as a minimum, water quality in the coastal marine area 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.	Reject
S162.013	Winstone Aggregates			S162.013	Winstone Aggregates	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	There is misalignment between this policy and Policy 18 which uses the terms protecting and restoring as opposed to protecting and enhancing. Clause (h) is not very specific in that it does not provide clear guidance for what is considered 'significant indigenous ecosystems and habitats'. It is not clear what other ecosystems and habitats might be captured by this policy, other than those listed in Appendix 16. The policy should either clearly link to the criteria in Policy 23 or provide another mechanism for	Align wording with Policy 18 or delete if it is repetitious. Amend wording to provide clear guidance on what constitutes significant indigenous ecosystems. This could be achieved by linking to the criteria in Policy 23. Amend the policy to accurately reflect the direction set in the NPS-FM 2020 and NPS-FM and any update. <i>[Note: Submission reference to prior submission points S162.007 and S162.008]</i>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								clearly identifying 'significant indigenous ecosystems and habitats', until these are fully identified by regional and district councils as required by Policy 23. Clause (n) appears to adopt an avoid approach to the removal or destruction of natural indigenous plants in wetlands (despite there not being a strict avoid requirement in the NPS-FM/ NES. The explanation to this policy purports to give effect to the NPS-FM but doesn't achieve that. Any wording (if retained or aligned with Policy 18) needs to be amended to reflect the NPS-FM 2020 NES and any update.		
S162.013	Winstone Aggregates	FS11.018	Fulton Hogan Limited	FS11.018	Fulton Hogan Limited	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Clause (n) of policy 40 adopts an avoid approach to the removal or destruction of natural indigenous plants in wetlands. This is inconsistent with the NPS-FM which includes a number of exceptions that enable works within wetlands. Similarly, the NESF does not prohibit vegetation clearance in wetlands. Clause (h) needs to provide a clear link to the SNA's that are to be protected (e.g. those that are identified under policy 23). There is misalignment between this policy and Policy 18 which uses the terms protecting and restoring as opposed to protecting and enhancing	Allow	Accept in part
S162.013	Winstone Aggregates	FS28.064	Horticulture New Zealand	FS28.064	Horticulture New Zealand	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	HortNZ support alignment with the direction set in the NPS-FM 2020 and NPS-FM and any update.	Allow Allow amendments to accurately reflect the direction set in the NPS-FM 2020 and NPS-FM and any update	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S162.013	Winstone Aggregates	FS20.281	Ātiawa ki Whakarongotai Charitable Trust	FS20.281	Ātiawa ki Whakarongotai Charitable Trust	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	<p>Ātiawa oppose the submissions from Aggregate and Quarry Association and Winstone Aggregates to the extent that the relief sought is inconsistent with national direction, particularly the NPS-FM.</p> <p>Ātiawa are particularly sensitive to aggregate extraction from awa, it is mana whenua who are guaranteed tino rangatiratanga over the land, waterways and all other taonga (including aggregate) through Te Tiriti o Waitangi. Historically aggregate extraction industry has failed to uphold the articles and the principles of Te Tiriti. Additionally, aggregate extraction has adverse effects on te taiao and mana whenua values.</p> <p>On the matter of 'balancing' national policy statements', recent case law states that the NPS-FM 2020 and NPS-UD 2020 are to be read together and reconciled under the regional policy statement and the district plans. It goes on to say, development capacity does not outweigh (trump) Te Mana o te Wai. Te Mana o te Wai is the fundamental concept of freshwater management: any thinking to the converse would not give effect to either national policy statement. Therefore, to reconcile national direction, it is not a balancing act, or even a compromise, the NPS-FM must be given effect to while achieving the purpose of the NPS-UD for example. This can be applied to aggregate extraction, the activity must be consistent with Te Mana o te Wai and the NPS-FM. The need for housing</p>	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								capacity is not license to forgo the requirements of the NPS-FM.		
S163.069	Wairarapa Federated Farmers			S163.069	Wairarapa Federated Farmers	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Reasons as set out in respect of the proposed objectives for freshwater.	That the amendments to Policy 40 be deleted.	Reject
S163.069	Wairarapa Federated Farmers	FS7.112	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.112	Royal Forest and Bird Protection Society (Forest & Bird)	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S163.069	Wairarapa Federated Farmers	FS20.234	Ātiawa ki Whakarongotai Charitable Trust	FS20.234	Ātiawa ki Whakarongotai Charitable Trust	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
S163.069	Wairarapa Federated Farmers	FS29.085	Ngā Hapu o Otaki	FS29.085	Ngā Hapu o Otaki	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented. Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S163.069	Wairarapa Federated Farmers	FS30.141	Beef + Lamb New Zealand Ltd	FS30.141	Beef + Lamb New Zealand Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Reject
S165.069	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.069	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Policy 40 is poorly drafted and not consistent with Policies 42 and 44 in relation to key matters. Policy 40 requires that, when considering a resource consent, particular regard must be had to giving effect to Te Mana o te Wai. This is poor drafting in that the policy should require that Te Mana o te Wai is given effect to. This can be compared with the Policy 42, which require that Te Mana o te Wai is given effect to and provide a range of matters that particular regard must be had to while giving effect to Te Mana o Te Wai. It is also inconsistent with Policy 44, which sets out outcomes that will be achieved by giving effect to Te Mana o te Wai. A requirement to avoid the loss of extent and values of natural inland wetlands is required. It is not clear how this policy would apply to coastal wetlands.	Add a further item: (x) avoiding the loss of extent or values of natural inland wetlands Make policy amendments to ensure that the NZCPS is given effect to in respect of coastal wetlands, inline with the submission on Policy 18 above, and any consequential amendments to the methods.	Accept in part
S165.069	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS22.009	Director-General of Conservation / Tumuaki Ahurei	FS22.009	Director-General of Conservation / Tumuaki Ahurei	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater	Support	The requested changes would better give effect to the NPSFM	Allow	Accept in part

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						ecosystems - consideration				
S165.069	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS19.034	Wellington Water Ltd ("Wellington Water")	FS19.034	Wellington Water Ltd ("Wellington Water")	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Overly inhibiting for delivery of RSI.	Disallow	Accept in part
S165.069	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								confusion amongst those who it impacts materially.		
S168.048	Rangitāne O Wairarapa Inc			S168.048	Rangitāne O Wairarapa Inc	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	<p>Rangitāne o Wairarapa support the intent of the policy but consider this should be strengthened. Having 'particular regard' to these matters will not be sufficient to achieve the objectives or give effect to Te Mana o te Wai. These things must be achieved.</p> <p>This policy should be setting up a framework to ensure that things don't get worse, not a framework to which 'regard' should be had. In particular, the policy needs to address the situation where target attribute states haven't yet been set; and set a 'maintain' or 'hold the line' framework.</p>	<p>Amend the policy to:</p> <p>Reword the opening clause of the policy along the lines of the wording used in Policy 42, which states "When considering an application...the regional council must give effect to Te Mana o te Wai and in doing so, must have particular regard to.... ";</p> <p>Minimise effects of the proposal on groundwater recharge areas... in accordance with environmental flows and levels (clause f)</p> <p>Maintain "ecologically relevant" flows to provide for the health and wellbeing of the water body and freshwater ecosystems, as 'natural flow regimes' can't be maintained if water takes are provided for (clause i);</p> <p>Maintain "or enhance" fish passage (clause k),</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.048	Rangitāne O Wairarapa Inc	FS31.158	Sustainable Wairarapa inc	FS31.158	Sustainable Wairarapa inc	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Nga mihi nui Ian Gun		
S168.049	Rangitāne O Wairarapa Inc			S168.049	Rangitāne O Wairarapa Inc	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	The policy needs to address the full range of matters in the NPS FM in relation to natural wetlands until such time as the regional plan is amended in accordance with clause 3.22 of the NPS FM.	Address additional matters in the NPS FM which relate to wetlands - to promote the restoration of natural inland wetlands, and the protection of their values, in particular the values of ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values and amenity value.	Accept in part
S168.049	Rangitāne O Wairarapa Inc	FS31.159	Sustainable Wairarapa inc	FS31.159	Sustainable Wairarapa inc	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S169.011	Kahungunu Ki Wairarapa			S169.011	Kahungunu Ki Wairarapa	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	<p>On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise</p>	Retain as notified	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.		
S169.011	Kahungunu Ki Wairarapa	FS31.012	Sustainable Wairarapa inc	FS31.012	Sustainable Wairarapa inc	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S170.049	Te Rūnanga o Toa Rangatira			S170.049	Te Rūnanga o Toa Rangatira	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Not Stated / Neutral	<p>Policy 40 is important to consider when evaluating consents however it is challenging to identify how developers and land users will implement these considerations and how the impact of Policy 40 (a) is assessed. The Policy requires that water quality, flows and water levels and aquatic habitats of surface water bodies are 'managed in a way that gives effect to Te Mana o Te Wai' it is unclear how this will be achieved. One other question related to this matter is that if an integrated view to water and a whole catchment approach is aimed at in this consideration, why this Policy only includes surface water bodies. Couldn't a development and land use activity negatively impact the groundwater?</p>	Amend the provision to address the relief sought.	No recommendation

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S170.049	Te Rūnanga o Toa Rangatira	FS29.163	Ngā Hapu o Otaki	FS29.163	Ngā Hapu o Otaki	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	No recommendation

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.		
S167.0105	Taranaki Whānui			S167.0105	Taranaki Whānui	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause to read: (x) the outcomes defined within Te Mahere Wai o Te Kāhui Taiao	Reject
S167.0106	Taranaki Whānui			S167.0106	Taranaki Whānui	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause to read: (x) partnering with mana whenua / tangata whenua in resource management and decision making	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						ecosystems - consideration				
S16.052	Kāpiti Coast District Council			S16.052	Kāpiti Coast District Council	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Council supports the proposed deletion of the references to notices of requirement and variations or reviews of district plans, however we note the policy explanation still implies that city and district council resource consent decisions must also consider the policy. We consider it would not be appropriate for city and district councils to consider the policy in their decision-making functions under the RMA as they have no functions to control activities to achieve target attribute states or discharges to water. Notwithstanding the fact explanatory text to policies have no legal weight under the RMA, we request amendments to clarify that the policy applies only to regional councils.	Amend Policy 41 as follows: Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration When considering an application for a regional resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by; (a) considering whether the activity will achieve environmental outcomes and target attribute states; and (b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met. ExplanationAn area of overlapping jurisdiction between Wellington Regional Council and district and city councils is the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on erosion prone land in rural areas and many small scale earthworks in urban areas - such as driveways and retaining walls - can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									minimise erosion and silt and sedimentation effects associated with these activities.	
S25.038	Carterton District Council			S25.038	Carterton District Council	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>While CDC supports a more holistic consideration of the effects of earthworks and vegetation clearance, it is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m²).</p> <p>It is unclear how policies, rules and methods, and subsequent assessment of land use consent applications, should be applied in a district plan context. CDC does not have the capacity to undertake an assessment of the matters described in this policy, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks.</p> <p>Policies, rules and methods addressing these matters are more appropriate in a regional plan and therefore CDC requests that references to district plans are removed from this policy.</p>	Remove reference to district plans from this policy, so that the requirements only apply to regional plans.	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.065	Porirua City Council			S30.065	Porirua City Council	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>The policy represents regulatory overreach and the application of s31 functions to district plan resource consents. These matters are already controlled and managed by the Natural Resources Plan and therefore the policy should be limited to regional consents only. It contains a high level of uncertainty for applicants, councils and other stakeholders. Issues of concern include:</p> <ul style="list-style-type: none"> • The policy applies to all resource consents regardless of scale or activity. It should be restricted to resource consents for earthworks and/or specified vegetation clearance. • It does not provide any guidance or direction as to what environmental outcomes and target attribute states are to be considered. • Discharges to water bodies or onto land where it may enter a waterway are a s30 function, managed under the Natural Resources Plan. • "controlling" indicates a controlled activity status may be appropriate which is inconsistent with (b) where certain discharges are to be avoided and a more restrictive activity status may be required. 	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, including limiting to regional consents only.	Accept
S30.065	Porirua City Council	FS25.098	Peka Peka Farm Limited	FS25.098	Peka Peka Farm Limited	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary	Allow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								submission or this further submission by Peka Peka Farm Ltd.		
S30.065	Porirua City Council	FS26.059	Meridian Energy Limited	FS26.059	Meridian Energy Limited	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	<p>Porirua CC requests clarification that Policy 41 only applies to applications to GWRC that fall within GWRC's s. 30 RMA functions.</p> <p>Meridian agrees that the scope of the policy should be confined to s. 30 RMA functions.</p>	Allow	Accept
S32.023	Director-General of Conservation			S32.023	Director-General of Conservation	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	<p>The proposed changes to this policy would leave a timing gap in its effect until environmental outcomes, target attribute states, and limits have been set. They would also mean that as long as those requirements were met there would be no requirement to minimise erosion and siltation.</p> <p>It is unclear why Notices of Requirement have been deleted</p>	<p>Amend the proposed policy to ensure that:</p> <ul style="list-style-type: none"> · The operative version of Policy 41 applies until such time as environmental outcomes and target attribute states are identified; · All matters in the operative version of Policy 41 remain covered (including considerations for designations, planning processes and minimising erosion) 	Accept in part
S32.023	Director-General of Conservation	FS10.004	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	FS10.004	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	<p>The Fuel Companies agree that until target attribute states are set there is uncertainty around the implications of the policy. However, any return to the operative version of Policy 41 would need to include reinstatement of those parts of the Explanation that clarify how the term 'minimise' is to be interpreted in this context. Specifically, that minimisation involves reduction of effects to the extent reasonably achievable and that effects cannot always be completely avoided. Any interpretation of the term 'minimise' that required effects</p>	<p>Allow in part</p> <p>Allow the submission only if the explanatory text relating to the term 'minimise' is reinstated along with the operative version, or components of the operative version of Policy 41.</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								to be reduced to the smallest amount possible without enabling consideration of the practicality of doing so in the context of the activity and receiving environment would be opposed.		
S32.023	Director-General of Conservation	FS24.003	Powerco Limited	FS24.003	Powerco Limited	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	Powerco agrees that until target attribute states are set there is uncertainty around the implications of the policy. However, any return to the operative version of Policy 41 would need to include reinstatement of those parts of the Explanation that clarify how the term 'minimise' is to be interpreted in this context. Specifically, that minimisation involves reduction of effects to the extent reasonably achievable and that effects cannot always be completely avoided. Any interpretation of the term 'minimise' that required effects to be reduced to the smallest amount possible without enabling consideration of the practicality of doing so in the context of the activity and receiving environment would be opposed.	Allow in part Allow the submission only if the explanatory text relating to the term 'minimise' is reinstated along with the operative version, or components of the operative version of Policy 41.	Reject
S32.023	Director-General of Conservation	FS30.301	Beef + Lamb New Zealand Ltd	FS30.301	Beef + Lamb New Zealand Ltd	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S34.063	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.063	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	<p>Support insofar as it pertains to regional functions.</p> <p>This place additional costs on our landowners with unclear/unjustified benefits.</p> <p>Districts and city councils don't control discharges and NPS- FM clause 3.5 (4) refers to managing effects of urban development on water, not discharges.</p> <p>The urban stormwater network has a regional consent and Council considers this process is better suited to manage any sediment issues.</p>	<p>Amend policy to read:</p> <p>Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration</p> <p>When considering an application for a regional resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by:</p> <p>(a) erosion; and</p> <p>(a) 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</p> <p>(b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.</p> <p>See comment in Policy 40 for</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									inclusion of new district plan specific policy.	
S79.043	South Wairarapa District Council			S79.043	South Wairarapa District Council	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose in part	As noted previously, the matters in this policy directly relate to the functions in s.30(1)(ii) for regional councils.	Amend policy 41 to clarify that these are for regional consents only.	Accept
S100.020	Meridian Energy Limited			S100.020	Meridian Energy Limited	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The proposed amendments convert the operative 'minimise' approach into an 'avoid' policy without specifying the threshold standard. The proposed amendments are therefore premature and cannot be properly evaluated for the purpose of section 32 because the key input for the evaluation is missing - i.e. the value of the suspended sediment standard.	Delete the following proposed amendments to Policy 41 and restore the operative wording as follows: Policy 41: Controlling Minimising the effects of earthworks and vegetation disturbance - consideration When considering an application for a resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by to minimise:(a) erosion; and (b) 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	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									<p>ecosystems are sustained. ; and(c) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.Explanation</p> <p>An area of overlapping jurisdiction between Wellington Regional Council and district and city councils is the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on erosion prone land in rural areas and many small scale earthworks in urban areas - such as driveways and retaining walls - can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to minimise erosion and silt and sedimentation effects associated with these activities.Minimisation requires effects to be reduced to the extent reasonably achievable whilst recognising that erosion, siltation and sedimentation effects can not always be completely avoided.</p>	
S100.020	Meridian Energy Limited	FS28.065	Horticulture New Zealand	FS28.065	Horticulture New Zealand	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Support amendment to 'minimise' and retaining operation provision in absence of limits.	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S100.020	Meridian Energy Limited	FS3.038	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.038	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Waka Kotahi supports this submission point and seeks further clarification about the intent and implementation of this policy	Allow Waka Kotahi seeks this submission point be allowed and seeks clarification as to the intent and implementation of this policy	Reject
S114.005	Fulton Hogan Ltd			S114.005	Fulton Hogan Ltd	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	While it is important that improvements are made where water quality outcomes are not met, the use of very directive "avoid" policies needs to be very carefully used. It is often not feasible to undertake day to day activities such as construction without having some level of discharge of sediment. If this is phrased as a very stringent "avoid" policy there is the potential that a large number of typical activities could not be undertaken.	(b) avoiding minimising discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.	Reject
S115.066	Hutt City Council			S115.066	Hutt City Council	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	No reasons given	Retain as notified	Accept in part
S128.042	Horticulture New Zealand			S128.042	Horticulture New Zealand	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	Question whether this policy is necessary, because: <ul style="list-style-type: none"> • Environmental outcomes and target attribute states in (a) are not yet set, presumably also suspended sediment limits under NPSFM • Earthworks is currently managed by regional and district plans, and there is direction elsewhere (in the RPS changes) directing the management in these plans - when they come through apply to consenting. 	Delete Policy 41.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.090	Ātiawa ki Whakarongotai Charitable Trust			S131.090	Ātiawa ki Whakarongotai Charitable Trust	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	<p>Ātiawa supports controls to manage the effects of earthworks and vegetation disturbance, this is a significant resource management issue for Ātiawa. Ātiawa seeks that erosion is considered as part of this policy, it is not clear why this has been removed from the framework as impacts of erosion remain a significant issue in the region. Ātiawa seek that all discharges to water bodies are avoided, regardless whether suspended sediment limits are exceeded or not. Sedimentation of water ways pose significant risk to water quality in the region. In addition, Ātiawa seeks that Te Mana o te Wai, and other mana whenua values are given effect to when considering earthworks and vegetation disturbance Although Ātiawa supports the intent to achieve environmental outcomes and target attribute states these have not been determined through the Whaitua process for Ātiawa rohe. In the absence of environmental outcomes and target attributes states we seek to work with Regional Council to ensure that there are appropriate interim measures to assess an proposed activity against.</p>	<p>Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration</p> <p>When considering an application for a resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by:(a) minimising erosion and the runoff of silt and sediment; and</p> <p>(b) considering whether the activity will achieve environmental outcomes and target attribute states; and</p> <p>(c) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.(d) giving effect to Te Mana o te Wai; and(e) considering the mana whenua values, including mana whenua relationship with their culture, traditions, ancestral lands, water, sites, wāhi tapu, and other taonga.</p>	Accept in part
S131.090	Ātiawa ki Whakarongotai Charitable Trust	FS26.058	Meridian Energy Limited	FS26.058	Meridian Energy Limited	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>The submission (p. 23) seeks that all discharges to water bodies are avoided, regardless of whether suspended sediment limits are exceeded or not.</p> <p>Meridian considers that the proposed amendment creates an unachievable 'avoid' policy. The pre-existing 'minimise' approach remains appropriate.</p>	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.090	Ātiawa ki Whakarongotai Charitable Trust	FS29.360	Ngā Hapu o Otaki	FS29.360	Ngā Hapu o Otaki	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept in part

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S133.012	Muaūpoko Tribal Authority			S133.012	Muaūpoko Tribal Authority	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.	Accept in part
S133.012	Muaūpoko Tribal Authority	FS20.359	Ātiawa ki Whakarongotai Charitable Trust	FS20.359	Ātiawa ki Whakarongotai Charitable Trust	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in	Disallow Disallow the whole submission	Accept in part

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								<p>our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and</p>		

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								mana whenua on the land, as we have undisturbed for over 198 years.		
S134.016	Powerco Limited			S134.016	Powerco Limited	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>The implications of the proposed policy wording are unclear as the environmental outcomes, target attribute states and suspended sediment limits referred to have not been set. It is uncertain whether those thresholds will be appropriate in the context of short term activities such as construction earthworks, particularly in the context that clause b sets an avoidance approach. For example, dewatering discharges can result in a short term exceedance of suspended sediment thresholds during the first flush, even where best practice is applied to the management of dewatering activities. This is commonly accepted as appropriate, subject to appropriate conditions and management approaches, across the country. Complete avoidance of such discharges is unlikely to be practicable.</p>	<p>Amend Policy 41 by retaining the wording used in the operative RPS, as follows:</p> <p>"Policy 41: Controlling Minimising the effects of earthworks and vegetation disturbance - consideration</p> <p>When considering an application for a resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by to minimise: (a) erosion; and (b) 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 (b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.</p>	Accept in part

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									<p>Explanation An area of overlapping jurisdiction between Wellington Regional Council and district and city councils is the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on erosion prone land in rural areas and many small scale earthworks in urban areas - such as driveways and retaining walls - can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to minimise erosion and silt and sedimentation effects associated with these activities.</p> <p>Minimisation requires effects to be reduced to the extent reasonably achievable whilst recognising that erosion, siltation and sedimentation effects can not always be completely avoided. This policy provides for consideration of earthworks and vegetation disturbance to minimise erosion and sediment runoff prior to plan controls being adopted by regional and district plans in accordance with policy 15. This policy shall cease to have effect once method 31 is implemented and policy 15 is given effect to in regional and district plans. Policies 15 and 41 are to ensure that Wellington Regional Council and district and city councils integrate the control earthworks and vegetation disturbance in their regional and district plans. Method 31 is for Wellington Regional Council and</p>	

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									district and city councils to develop a protocol for earthworks and erosion from vegetation disturbance. The protocol will assist with implementation of policies 15 and 41. Some activities - such as major road construction - are likely to require resource consents from both Wellington regional council and district or city councils, which will work together to control the effects of the activity. Vegetation disturbance includes harvesting plantation forestry"	
S140.068	Wellington City Council (WCC)			S140.068	Wellington City Council (WCC)	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Support as proposed.	Retain as notified.	Accept in part
S147.067	Wellington Fish and Game Council			S147.067	Wellington Fish and Game Council	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.067	Wellington Fish and Game Council	FS19.131	Wellington Water Ltd ("Wellington Water")	FS19.131	Wellington Water Ltd ("Wellington Water")	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part
S147.067	Wellington Fish and Game Council	FS30.236	Beef + Lamb New Zealand Ltd	FS30.236	Beef + Lamb New Zealand Ltd	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept in part

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								climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S157.021	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.021	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The implications of the proposed policy wording are unclear as the environmental outcomes, target attribute states and suspended sediment limits referred to have not been set. It is uncertain whether those thresholds will be appropriate in the context of short term activities such as construction earthworks, particularly in the context that clause b sets an avoidance approach. For example, dewatering discharges can result in a short term exceedance of suspended sediment thresholds during the first flush, even where best practice is applied to the management of dewatering activities. This is commonly accepted across the country as appropriate, subject to appropriate conditions and adoption of best practice management approaches. Complete avoidance of such discharges is unlikely to be practicable.	Amend Policy 41 by retaining the wording used in the operative RPS as follows: Policy 41: Controlling Minimising the effects of earthworks and vegetation disturbance - consideration When considering an application for a resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by to minimise:(a) erosion; and(b) 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(b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.	Accept in part

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S157.022	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.022	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The implications of the proposed policy wording are unclear as the environmental outcomes, target attribute states and suspended sediment limits referred to have not been set. It is uncertain whether those thresholds will be appropriate in the context of short term activities such as construction earthworks, particularly in the context that clause b sets an avoidance approach. For example, dewatering discharges can result in a short term exceedance of suspended sediment thresholds during the first flush, even where best practice is applied to the management of dewatering activities. This is commonly accepted across the country as appropriate, subject to appropriate conditions and adoption of best practice management approaches. Complete avoidance of such discharges is unlikely to be practicable.	Amend Policy 41 by retaining the wording used in the operative RPS, Explanation An area of overlapping jurisdiction between Wellington Regional Council and district and city councils is the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on erosion prone land in rural areas and many small scale earthworks in urban areas - such as driveways and retaining walls - can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to minimise erosion and silt and sedimentation effects associated with these activities. Minimisation requires effects to be reduced to the extent reasonably achievable whilst recognising that erosion, siltation and sedimentation effects can not always be completely avoided. This policy provides for consideration of earthworks and vegetation disturbance to minimise erosion and sediment runoff prior to plan controls being adopted by regional and district plans in accordance with policy 15. This policy shall cease to have effect once method 31 is implemented and policy 15 is given effect to in regional and district plans. Policies 15 and 41 are to ensure that Wellington	Accept in part

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									<p>Regional Council and district and city councils integrate the control earthworks and vegetation disturbance in their regional and district plans. Method 31 is for Wellington Regional Council and district and city councils to develop a protocol for earthworks and erosion from vegetation disturbance. The protocol will assist with implementation of policies 15 and 41. Some activities - such as major road construction - are likely to require resource consents from both Wellington regional council and district or city councils, which will work together to control the effects of the activity. Vegetation disturbance includes harvesting plantation forestry.</p> <p><i>[Note: Submission related to prior submission point S157.021]</i></p>	
S162.014	Winstone Aggregates			S162.014	Winstone Aggregates	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	Generally supports this policy and requests minor amendments for consistency between the heading and the policy text.	Amend. Policy 41: Controlling Managing the effects of earthworks and vegetation disturbance	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S162.014	Winstone Aggregates	FS20.282	Ātiawa ki Whakarongotai Charitable Trust	FS20.282	Ātiawa ki Whakarongotai Charitable Trust	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>Ātiawa oppose the submissions from Aggregate and Quarry Association and Winstone Aggregates to the extent that the relief sought is inconsistent with national direction, particularly the NPS-FM.</p> <p>Ātiawa are particularly sensitive to aggregate extraction from awa, it is mana whenua who are guaranteed tino rangatiratanga over the land, waterways and all other taonga (including aggregate) through Te Tiriti o Waitangi. Historically aggregate extraction industry has failed to uphold the articles and the principles of Te Tiriti. Additionally, aggregate extraction has adverse effects on te taiao and mana whenua values.</p> <p>On the matter of 'balancing' national policy statements', recent case law states that the NPS-FM 2020 and NPS-UD 2020 are to be read together and reconciled under the regional policy statement and the district plans. It goes on to say, development capacity does not outweigh (trump) Te Mana o te Wai. Te Mana o te Wai is the fundamental concept of freshwater management: any thinking to the converse would not give effect to either national policy statement. Therefore, to reconcile national direction, it is not a balancing act, or even a compromise, the NPS-FM must be given effect to while achieving the purpose of the NPS-UD for example. This can be applied to aggregate extraction, the activity must be consistent with Te Mana o te Wai and the NPS-FM. The need for housing</p>	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								capacity is not license to forgo the requirements of the NPS-FM.		
S163.070	Wairarapa Federated Farmers			S163.070	Wairarapa Federated Farmers	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	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. Refer to submission for more detail.	That the amendments to Policy 41 be deleted.	Reject
S163.070	Wairarapa Federated Farmers	FS7.113	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.113	Royal Forest and Bird Protection Society (Forest & Bird)	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept in part
S163.070	Wairarapa Federated Farmers	FS20.235	Ātiawa ki Whakarongotai Charitable Trust	FS20.235	Ātiawa ki Whakarongotai Charitable Trust	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.		
S163.070	Wairarapa Federated Farmers	FS29.086	Ngā Hapu o Otaki	FS29.086	Ngā Hapu o Otaki	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated	Accept
S163.070	Wairarapa Federated Farmers	FS30.142	Beef + Lamb New Zealand Ltd	FS30.142	Beef + Lamb New Zealand Ltd	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the	Allow	Reject

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								scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.		
S165.070	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.070	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	Amendments needed to ensure this policy aligns with the direction in the NSPFM, for example, its Objective and Policies 1, 3 and 9. Additional clause needed to ensure the maintenance and enhancement of coastal water quality is not overlooked and the NZCPS is also given effect to.	Amend as follows: Policy 41: Controlling Minimising the effects of earthworks Earthworks and vegetation disturbance - consideration 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 controlling for earthworks and or vegetation disturbance by to minimise, give effect to Te Mana o te Wai by: (a) erosion; and (a) considering whether the activity will achieve achieving 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 (b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met ; Include an additional clause addressing coastal environments: (x) when assessing an application for a resource consent for earthworks or vegetation clearance and any associated discharge of	Accept in part

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									contaminant ensure that the activity avoids adverse effects on aquatic ecosystem health, indigenous biodiversity in coastal water and receiving environments	
S165.070	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS10.036	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	FS10.036	BP Oil NZ Ltd Mobil Oil NZ Ltd and Z Energy Ltd (the Fuel Companies)	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The Fuel Companies do not support the 'avoidance' approach proposed by Forest & Bird, and note the wording proposed is more restrictive than the NZCPS.	Disallow Disallow the submission and do not make the amendments sought.	Accept in part
S165.070	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS24.032	Powerco Limited	FS24.032	Powerco Limited	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	Powerco does not support the 'avoidance' approach proposed by Forest & Bird, and notes the wording proposed is more restrictive than the NZCPS.	Disallow Disallow the submission and do not make the amendments sought.	Accept in part
S165.070	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S168.050	Rangitāne O Wairarapa Inc			S168.050	Rangitāne O Wairarapa Inc	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	<p>Rangitāne o Wairarapa consider that this policy should be setting up a 'make sure it doesn't get worse' framework, not a 'regard to' one. In particular the policy should address the situation where target attribute states haven't been set yet; and set a 'maintain' framework.</p> <p>Clause (b) confuses 'limits', which are rules, with 'target attribute states', which are the water quality standards.</p>	<p>Amend the policy to:</p> <p>Reword the opening clause of the policy along the lines of the wording used in Policy 42, which states "When considering an application...the regional council must give effect to Te Mana o te Wai and in doing so, must have particular regard to.... ";</p> <p>Maintain current water quality, until environmental outcomes and target attribute states are in place;</p> <p>Reword clause b so that it refers to target attribute states;</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S168.050	Rangitāne O Wairarapa Inc	FS31.160	Sustainable Wairarapa inc	FS31.160	Sustainable Wairarapa inc	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Nga mihi nui Ilan Gun		
S168.051	Rangitāne O Wairarapa Inc			S168.051	Rangitāne O Wairarapa Inc	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	The explanatory text refers to the intention of the policy being to 'minimise' effects. This does not accurately reflect the direction of the NPS FM, which is to manage to limits and target attribute states.	Delete the word 'minimise' from the explanatory text and refer instead to the need to manage activities to achieve limits and target attribute states.	Reject
S168.051	Rangitāne O Wairarapa Inc	FS31.161	Sustainable Wairarapa inc	FS31.161	Sustainable Wairarapa inc	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due	Not stated	Reject

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								<p>process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S170.051	Te Rūnanga o Toa Rangatira			S170.051	Te Rūnanga o Toa Rangatira	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	<p>From this a good segue way is, the Policy 41 Controlling the effects of earthworks and vegetation disturbance - consideration as per the comments above, 'minimising' can be strengthened to say controlled or avoided. We agree that this needs to be a consideration.</p>	Retain as notified.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S170.051	Te Rūnanga o Toa Rangatira	FS29.165	Ngā Hapu o Otaki	FS29.165	Ngā Hapu o Otaki	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.		
S167.0107	Taranaki Whānui			S167.0107	Taranaki Whānui	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Taranaki Whānui supports the amendments to Policy 41	Retain as notified.	Reject
S16.053	Kāpiti Coast District Council			S16.053	Kāpiti Coast District Council	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Council supports the applicability of the policy to regional consents only and request this is not changed to include city and district councils.	Retain	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S30.066	Porirua City Council			S30.066	Porirua City Council	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	These are all matters that are all relevant to a regional council under s30 of the RMA.	Amend policy so that it applies to regional consents only: When considering an application for a regional resource consent the regional council must give effect to Te Mana o te Wai and in doing so must have particular regard to:	Accept
S30.066	Porirua City Council	FS25.099	Peka Peka Farm Limited	FS25.099	Peka Peka Farm Limited	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept
S32.024	Director-General of Conservation			S32.024	Director-General of Conservation	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area. They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.	Retain as notified, except for the following changes or words to like effect: (j) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries and the coastal marine area ;	Reject
S32.024	Director-General of Conservation	FS20.017	Ātiawa ki Whakarongotai Charitable Trust	FS20.017	Ātiawa ki Whakarongotai Charitable Trust	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Ātiawa support strengthening provisions to ensure that the coastal marine area is protected from the impacts of urban development.	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S32.024	Director-General of Conservation	FS30.302	Beef + Lamb New Zealand Ltd	FS30.302	Beef + Lamb New Zealand Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept in part
S32.025	Director-General of Conservation			S32.025	Director-General of Conservation	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area. They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.	add a new clause: "Require that urban development is located and designed to allow water bodies to meander and move naturally".	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S32.025	Director-General of Conservation	FS17.018	Wellington International Airport Limited ("WIAL")	FS17.018	Wellington International Airport Limited ("WIAL")	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission. WIAL is concerned the submission seeks to apply the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area and considers reference to the coastal marine area in this policy should be deleted.	Disallow	Accept in part
S32.025	Director-General of Conservation	FS20.012	Ātiawa ki Whakarongotai Charitable Trust	FS20.012	Ātiawa ki Whakarongotai Charitable Trust	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Ātiawa support actions that enable streams to flow, move and meander naturally, including daylighting of streams.	Allow	Accept in part
S32.025	Director-General of Conservation	FS30.303	Beef + Lamb New Zealand Ltd	FS30.303	Beef + Lamb New Zealand Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S34.064	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.064	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	Support amendment to apply to regional consents only.	Retain the policy as notified, as regional consents only.	Accept in part
S113.018	Wellington Water			S113.018	Wellington Water	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	This policy is reliant on the definition of hydrological controls, which is a very unclear definition. Clarity would be improved by adding the suggested wording to these this clause.	Add the following to policy 42(k): Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;	Reject
S113.033	Wellington Water			S113.033	Wellington Water	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	The linking between the stem and subclauses of the policy need different wording	Amend links for grammatical consistency through the whole policy. For instance: (a) adopting an integrated approach...	Accept
S113.034	Wellington Water			S113.034	Wellington Water	Policy 42: Effects on freshwater and the coastal marine area from urban	Oppose	Minimise and maximise are only appropriate if defined in accordance with the pNRP (clause (I))	Retain "minimise" and "maximise" in clause (I) only if defined in accordance with the pNRP.	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						development - consideration				
S113.035	Wellington Water			S113.035	Wellington Water	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	Clause (r) should be redrafted as integrated management is a very broad term and a catchment approach is more appropriate in this context.	Amend subclause: (r) applying a catchment approach (ki uta ki tai) an integrated management approach to managing wastewater networks including partnering with mana whenua, as kaitiaki, and allowance for appropriately designed overflow points where necessary to support growth and consideration of different approaches to wastewater management to resolve overflows.	Accept in part
S113.036	Wellington Water			S113.036	Wellington Water	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Not Stated / Neutral	Consideration of the matters in clauses (p) and (q) of Policy 42 should also apply to District Plans as they control the form of development and are more commonly used than regional plans. Then developers can be made aware of source water protection area risks earlier in their process, increasing the potential for a good outcome.	Insert new Policy 42A as follows: Policy 42A: Effects on freshwater from urban development - district plans District plans shall include policies and methods to:(a) Support and achieve efficient end use of reticulated water, and alternate water supplies for non-potable uses(b)Where appropriate, protect drinking water sources from inappropriate use and development by use of policies and overlays advising of the restrictions in the Regional Plans and recommending early engagement with GW. This is supported by a non-regulatory method that District and City council staff will advise of the drinking water protections in the regional plan via LIMs and PIMs,	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									responses to public enquiries and preapplication meetings.	
S113.036	Wellington Water	FS13.027	Wellington City Council	FS13.027	Wellington City Council	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Not Stated / Neutral	Inconsistent with Wellington City Council's position on the matter.	Disallow	Accept
S115.067	Hutt City Council			S115.067	Hutt City Council	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	No reasons given	Retain as notified	Accept in part
S118.012	Peka Peka Farm Limited			S118.012	Peka Peka Farm Limited	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	<p>Policy 42 is a consideration policy relevant to effects on freshwater and the coastal marine area. The policy specifies 18 matters that must be considered.</p> <p>As for Policy FW.3 above, the number of matters specified makes the policy cumbersome and difficult to interpret. Supports the intent of the policy but seeks that the drafting of the policy be improved, including by removing any unnecessary duplication of the NPS-FM or other RPS policies.</p>	Amend Policy 42 to address the relief sought in the submission.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.091	Ātiawa ki Whakarongotai Charitable Trust			S131.091	Ātiawa ki Whakarongotai Charitable Trust	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Ātiawa supports the considerations applied to this policy, and the intent of the policy to manage the effects of urban development on freshwater and the coastal and marine area.	Retain as notified.	Accept in part
S131.091	Ātiawa ki Whakarongotai Charitable Trust	FS29.361	Ngā Hapu o Otaki	FS29.361	Ngā Hapu o Otaki	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support</p>	Not stated	Accept in part

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								<p>in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S133.013	Muaūpoko Tribal Authority			S133.013	Muaūpoko Tribal Authority	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S133.013	Muaūpoko Tribal Authority	FS20.360	Ātiawa ki Whakarongotai Charitable Trust	FS20.360	Ātiawa ki Whakarongotai Charitable Trust	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from</p>	<p>Disallow</p> <p>Disallow the whole submission</p>	Accept in part

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								the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.		
S147.068	Wellington Fish and Game Council			S147.068	Wellington Fish and Game Council	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Necessary to give effect to the NPS-FM.	. Retain as notified.	Accept in part
S147.068	Wellington Fish and Game Council	FS19.132	Wellington Water Ltd ("Wellington Water")	FS19.132	Wellington Water Ltd ("Wellington Water")	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to</p>	Disallow	Accept in part

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								<p>address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>		
S147.068	Wellington Fish and Game Council	FS30.237	Beef + Lamb New Zealand Ltd	FS30.237	Beef + Lamb New Zealand Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	Disallow That the submission be disallowed with the exception of 147.007	Accept in part
S148.037	Wellington International Airport Ltd (WIAL)			S148.037	Wellington International Airport Ltd (WIAL)	Policy 42: Effects on freshwater and the coastal marine area from urban	Oppose in part	<p>WIAL is concerned that this policy has applied the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area. There are separate provisions relating to the management of the coastal</p>	Delete reference to the coastal marine area in this policy. Ensure it only applies to freshwater and inconsistent with the National Policy Statement for Freshwater Management 2020.	Accept in part

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						development - consideration		environment and coastal marine area in the RPS.		
S157.035	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.035	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. 	amend subclause (g) The ability for Require that the development, including stormwater discharges, earthworks and vegetation clearance to meets any limits set in a regional plan and the effects of any exceedances;	Accept in part

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								<p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological</p>		

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								<p>control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		
S157.035	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS3.040	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.040	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Waka Kotahi supports the submission point ack of clarity regarding the intent and implementation of this policy.	Allow Waka Kotahi seeks this submission point be allowed and seeks clarification as to the intent and implementation of this policy	Accept in part

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S157.036	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.036	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p>	amend subclause (h) The extent to which Require that urban development is located and designed and constructed using the principles of Water Sensitive Urban Design;	Accept

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								<p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development</p>		

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								<p>contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		

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S157.037	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.037	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p>	<p>amend subclause</p> <p>(i) The extent to which Require that urban development is located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours;</p>	Reject

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								<p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development</p>		

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								<p>contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		

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S157.038	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.038	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p>	amend subclause (j) The extent to which Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;	Accept

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								<p>contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		

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S157.039	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.039	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p>	<p>amend subclause</p> <p>(k) The extent to which Require hydrological controls to avoid reduce adverse effects of stormwater runoff quantity (flows and volumes) and maintain, to the extent practicable, on natural stream flows</p>	Accept in part

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								<p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development</p>		

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								<p>contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		
S157.039	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS3.039	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.039	Waka Kotahi NZ Transport Agency (Waka Kotahi)	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Waka Kotahi supports the use of "reduce" rather than "avoid" due to the lack of clarity regarding the intent and implementation of this policy.	Allow Waka Kotahi seeks this submission point be allowed and seeks clarification as to the intent and implementation of this policy	Accept in part

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S157.040	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.040	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p>	<p>amend subclause</p> <p>(l) The extent to which subdivision, use and development stormwater quality management that will minimises the generation of contaminants in stormwater, and maximises, to the extent practicable, the removal of contaminants from stormwater;</p>	Accept in part

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								<p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development</p>		

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								<p>contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		

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S157.041	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.041	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p>	amend subclause. (m) Require The provision of riparian buffers for all waterbodies and avoid piping of rivers;	Accept

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								<p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development</p>		

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								<p>contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>		
S165.071	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.071	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	<p>As in Policy 40, Policy 42 conflates "giving effect to" and "having particular regard to".</p> <p>These are separate concepts and the Council should be giving effect to Te Mana o te Wai</p>	<p>Amend the introductory words as follows:</p> <p>When considering an application for a resource consent the regional council must give effect to Te Mana o te Wai by:</p> <p>Make consequential amendments, for example, in (a) adopt would need to be amended to adopting for the provision to make sense</p>	Reject

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S165.071	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept in part
S168.052	Rangitāne O Wairarapa Inc			S168.052	Rangitāne O Wairarapa Inc	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	As currently worded, this policy applies much more broadly than to just urban development. If that is all it is intended to cover, then some of the matters may need narrowing. However, confining the scope of this policy in this manner would not be an approach that Rangitāne o Wairarapa would support. Restricting the scope of the policy in this way is neither appropriate, efficient or effective, and neither will it give full effect to the NPS FM.	Amend the policy: So that a consistent grammatical tense is used throughout the policy; So that urban development achieves the target attribute states and environmental flows set for the catchment (clause f and g), not just activity limits; So that it applies to all development, not just 'urban development' (which is undefined	Accept in part

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									by the plan change), in order to efficiently and effectively achieve integrated management.	
S168.052	Rangitāne O Wairarapa Inc	FS31.162	Sustainable Wairarapa inc	FS31.162	Sustainable Wairarapa inc	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further	Not stated	Accept in part

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								<p>explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S169.012	Kahungunu Ki Wairarapa			S169.012	Kahungunu Ki Wairarapa	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	<p>On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.</p>	Retain as notified	Accept in part

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S169.012	Kahungunu Ki Wairarapa	FS31.013	Sustainable Wairarapa inc	FS31.013	Sustainable Wairarapa inc	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

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								Nga mihi nui Ian Gun		
S170.052	Te Rūnanga o Toa Rangatira			S170.052	Te Rūnanga o Toa Rangatira	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Not Stated / Neutral	'Minimising contamination' is not adequate wording for the intention of the Policy. It is ideal this consideration to Policy 42 is reworded to say, no contamination in stormwater.	'Minimising contamination' is not adequate wording for the intention of the Policy. Reword to say, no contamination in stormwater.	Reject

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S170.052	Te Rūnanga o Toa Rangatira	FS29.166	Ngā Hapu o Otaki	FS29.166	Ngā Hapu o Otaki	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.		
S167.0108	Taranaki Whānui			S167.0108	Taranaki Whānui	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	Support with further direction for partnership in decision making	Insert a new clause: (x) partnering with mana whenua / tangata whenua in resource management and decision making	Reject
S167.0108	Taranaki Whānui	FS6.038	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	FS6.038	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	We support this submission because this will enable better partnership in relation to climate resilient urban areas. This will also mean that mana whenua/ tangata whenua aspirations are upheld.	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S115.068	Hutt City Council			S115.068	Hutt City Council	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Support the deletion of this policy	Delete Policy 43 as proposed	Accept
S131.092	Ātiawa ki Whakarongotai Charitable Trust			S131.092	Ātiawa ki Whakarongotai Charitable Trust	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Ātiawa supports deletion of this policy as these matters are provided for in a more holistic manner through Policy 41 and Policy 42.	Retain as notified.	Accept
S131.092	Ātiawa ki Whakarongotai Charitable Trust	FS29.362	Ngā Hapu o Otaki	FS29.362	Ngā Hapu o Otaki	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p>	Not stated	Accept

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								<p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S140.069	Wellington City Council (WCC)			S140.069	Wellington City Council (WCC)	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Support the deletion of this policy.	Delete Policy 43 as proposed.	Accept

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S170.053	Te Rūnanga o Toa Rangatira			S170.053	Te Rūnanga o Toa Rangatira	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Not Stated / Neutral	<p>How do we identify resource consents' ability to demonstrate the 'contribution to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems'? There is need for resource consents to show the environmental progress they are demonstrating in the application and proposal. It is unclear how this would be evaluated. Even in the cases of drafting clauses in consents, may not be doing much- what is our benchmark and how do we measure and label what is an ecosystem achievement? The consideration may not provide applicants and consent processing staff enough clarity and certainty to describe what is a contribution.</p> <p>Contribution as a word can be stronger; if this is a consideration it needs to match its empowering qualities and the level of higher order policy execution.</p>	<p>Require resource consents to demonstrate environmental progress to the 'contribution to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems'.</p> <p>Clarify how this would be evaluated (e.g. benchmarks and how this is measured)</p> <p>Strengthen the wording of the provision (e.g. replace 'contribution' for a stronger word).</p>	Reject

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S170.053	Te Rūnanga o Toa Rangatira	FS29.167	Ngā Hapu o Otaki	FS29.167	Ngā Hapu o Otaki	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.		
S167.0109	Taranaki Whānui			S167.0109	Taranaki Whānui	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Taranaki Whānui supports the deletion of this policy	Retain as notified.	Accept
S30.067	Porirua City Council			S30.067	Porirua City Council	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	<p>These are all matters that are all relevant to a regional council under s30 of the RMA.</p> <p>A notice of requirement does not involve or give any form of approval for the take or use of water, which require resource consents from the regional council. These are beyond the scope of what can be considered by a requiring authority or a territorial authority through a notice of</p>	<p>Amend policy so that it applies to regional consents only, and not notices of requirement:</p> <p>When considering an application for a regional resource consent, 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 so that:</p>	Accept

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								<p>requirement.</p> <p>This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional plans</p>		
S30.067	Porirua City Council	FS25.100	Peka Peka Farm Limited	FS25.100	Peka Peka Farm Limited	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept
S86.002	Irrigation New Zealand (IrrigationNZ)			S86.002	Irrigation New Zealand (IrrigationNZ)	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	The implementation of the NPS-HPL must be considered in the RPS Change 1, as well as to achieve balance between NPS-UD, NPS-FM and NPS-HPL when either policy reaches the limitations in practice.	Amendment of Policy 44 to give effect to the National Policy Statement on Highly Productive Land 2022 (NPS-HPL).	Reject
S86.002	Irrigation New Zealand (IrrigationNZ)	FS19.019	Wellington Water Ltd ("Wellington Water")	FS19.019	Wellington Water Ltd ("Wellington Water")	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	Water for community supplies should take precedence.	Disallow	Accept
S86.002	Irrigation New Zealand (IrrigationNZ)	FS28.066	Horticulture New Zealand	FS28.066	Horticulture New Zealand	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	HortNZ support amendment to give effect to the NPSHPL	Allow	Reject

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S86.002	Irrigation New Zealand (IrrigationNZ)	FS20.028	Ātiawa ki Whakarongotai Charitable Trust	FS20.028	Ātiawa ki Whakarongotai Charitable Trust	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	Ātiawa oppose the submission point, we refer to recent case law on the matter of 'balancing' national policy statements', which states that the NPS-FM 2020 and NPS-UD 2020 are to be read together and reconciled under the regional policy statement and the district plans. It goes on to say, development capacity does not outweigh (trump) Te Mana o te Wai. Te Mana o te Wai is the fundamental concept of freshwater management: any thinking to the converse would not give effect to either national policy statement. Therefore, to reconcile national direction, it is not a balancing act, or even a compromise, the NPS-FM must be given effect to while achieving the purpose of the NPS-HPL for example.	Disallow	Accept
S86.002	Irrigation New Zealand (IrrigationNZ)	FS9.014	Wairarapa Water Users Society	FS9.014	Wairarapa Water Users Society	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	The NPS-HPL must be factored into this RPS Review process	Not stated Amendment of Policy 44 to give effect to the National Policy Statement on Highly Productive Land 2022 (NPS-HPL).	Reject
S102.048	Te Tumu Paeroa Office of the Māori Trustee			S102.048	Te Tumu Paeroa Office of the Māori Trustee	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Considers that Policy 44 should be a regulatory policy, rather than a "Matter to be considered". This will ensure appropriate emphasis of the policy is applied and to give effect to the overarching Resource Management objective.	Amend Policy 44 to be a regulatory policy.	Reject
S113.037	Wellington Water			S113.037	Wellington Water	Policy 44: Managing water takes and use to give effect to Te Mana o te	Support in part	Clause (d) should reflect the variation in waterbody flow levels across the seasons. This will encourage water providers to take more water when it is readily available.	Amend clause (d) (d) Take limits (minimum flows and allocation limits) are achieved that provide for flow or level variability, safeguard	Reject

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						Wai - consideration			ecosystem health, reflect annual and seasonal water cycles , provide for the life cycle needs of aquatic life, and take into account environmental outcomes	
S113.038	Wellington Water			S113.038	Wellington Water	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Clause (h) should be altered for clarity and public health outcomes	Amend clause (d) (h) There is consideration of alternate water supplies (only non-potable in urban areas) such as storage or capture harvesting of rainwater for use during the drier summer months	Accept
S115.069	Hutt City Council			S115.069	Hutt City Council	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	No reasons given	Retain as notified	Accept in part
S128.043	Horticulture New Zealand			S128.043	Horticulture New Zealand	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Subclauses (c) and (e) are too specific given NPSFM process for whitua which set the environmental flows and levels, and take limits through the NPSFM 2020 process. In addition: <ul style="list-style-type: none"> • Take limits need to be set to meet environmental flows and levels, so there is not a need to include both; • Take limits will be set to provide for freshwater values, therefore it is not necessary to state the additional text. 	Replace subclauses (c) and (d) with new clause: (c) Where take limits have been set, take limits are achieved; (c) Environmental flows and levels, including variability of flows, are achieved; (d) 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;	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.093	Ātiawa ki Whakarongotai Charitable Trust			S131.093	Ātiawa ki Whakarongotai Charitable Trust	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	<p>Ātiawa support the amendments made to Policy 44 to better provide for mana whenua values, including Māori freshwater values, achieving overall ecosystem health, and giving effect to Te Mana o te Wai in regards to water takes and use. Ātiawa seeks specific reference to the hierarchy of obligations to ensure that water takes and use are considered against the national legislation. Additionally, Ātiawa seeks reference to ki uta ki tai, to acknowledge the impact of a water take and usage on the entire water cycle, and the wider ecosystem.</p>	<p>Policy 44: Managing water take and use to give effect to Te Mana o te Wai- consideration</p> <p>When considering an application for a resource consent, 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 so that:</p> <p>(a) Māori freshwater values, including mahinga kai are provided for;</p> <p>(b) sites of significance, wāhi tapu and wāhi tupuna are protected;(bb) the hierarchy of obligations is provided for;(bc) integrated management, ki uta ki tai is considered;</p> <p>(c) Environmental flows and levels, including variability of flows, are achieved;</p> <p>(d) 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;</p> <p>(e) 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</p>	Accept in part

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									<p>measure and report the actual amount of water taken;</p> <p>(g) requiring the consent holder to adopt water conservation and demand management measures and demonstrate how water will be used efficiently; and</p> <p>(h) there is consideration of alternate water supplies such as storage or capture of rainwater for use during the drier summer months</p>	
S131.093	Ātiawa ki Whakarongotai Charitable Trust	FS19.004	Wellington Water Ltd ("Wellington Water")	FS19.004	Wellington Water Ltd ("Wellington Water")	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	<p>Oppose (bb) as being redundant given the mention of Te Mana o te Wai in the chapeau.</p> <p>Ki uta ki tai approach is appropriate for managing water bodies if it provides for progressive improvement over an appropriate duration.</p>	Allow in part	Accept in part

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S131.093	Ātiawa ki Whakarongotai Charitable Trust	FS29.363	Ngā Hapu o Otaki	FS29.363	Ngā Hapu o Otaki	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept in part

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S133.014	Muaūpoko Tribal Authority			S133.014	Muaūpoko Tribal Authority	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.	Accept in part
S133.014	Muaūpoko Tribal Authority	FS20.361	Ātiawa ki Whakarongotai Charitable Trust	FS20.361	Ātiawa ki Whakarongotai Charitable Trust	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the	Disallow Disallow the whole submission	Accept in part

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								<p>extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and</p>		

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								mana whenua on the land, as we have undisturbed for over 198 years.		
S136.017	DairyNZ			S136.017	DairyNZ	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	Delay inclusion of the changes of this until all of the NPS-FM can be implemented into the full RPS review. This will allow for further clarity about what Te Mana o te Wai will mean at a regional level as well as the outcomes of the Water Allocation Review in Method 48 to be considered.	Delete policy and address the issue through a full review of the RPS.	Reject
S136.017	DairyNZ	FS19.009	Wellington Water Ltd ("Wellington Water")	FS19.009	Wellington Water Ltd ("Wellington Water")	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	Te Mana o te Wai will take about a decade to fully realise in planning documents - an incremental approach is as valid as any other.	Disallow	Accept
S136.017	DairyNZ	FS28.067	Horticulture New Zealand	FS28.067	Horticulture New Zealand	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	HortNZ agree that further work is required to articulate Te Mana o Te Wai at the regional level	Allow Allow review as part of full review of the RPS (as alternative relief to that proposed in HortNZ's submission)	Reject

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S136.017	DairyNZ	FS9.004	Wairarapa Water Users Society	FS9.004	Wairarapa Water Users Society	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Addressing the implementation of Te Mana o te Wai in a more appropriate timeframe will lead to a better outcome.	Not stated Remove Policy 44	Reject
S136.017	DairyNZ	FS21.004	Irrigation NZ	FS21.004	Irrigation NZ	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Addressing the implementation of Te Mana o te Wai in a more appropriate timeframe will lead to a better outcome.	Not stated Remove Policy 44	Reject
S140.070	Wellington City Council (WCC)			S140.070	Wellington City Council (WCC)	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Support as proposed.	Retain as notified.	Accept in part
S144.041	Sustainable Wairarapa Inc			S144.041	Sustainable Wairarapa Inc	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	It is unlikely that large scale water storage can give effect to Te Mana o te Wai.	Amend clause (h) Alternate water supplies such as storage or capture of rainwater should be defined to be for public water supply or at on-site farm scale or smaller.	Reject
S144.041	Sustainable Wairarapa Inc	FS28.068	Horticulture New Zealand	FS28.068	Horticulture New Zealand	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	The proposed wording may restrict water storage options unnecessarily	Disallow	Accept

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S145.002	Wairarapa Water Users Society			S145.002	Wairarapa Water Users Society	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	This would appear to be an additional requirement for new consents and the renewal of existing consents. There are existing limitations to avoid water sources becoming over-allocated and the need for applicants to consider alternatives is unnecessary.	Removal of the new clause (h) (h) there is consideration of alternative water supplies such as storage or capture of rainwater for use during the drier summer months	Reject
S147.015	Wellington Fish and Game Council			S147.015	Wellington Fish and Game Council	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Strongly support the proposed changes to Policy 44 in order to give effect to the NPS-FM and incorporate the concept of Te Mana o te Wai. However, as drafted the proposed changes to Policy 44 do not give proper effect to Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout, and salmon. The suggested amendment is intended to address this deficiency.	new subclause:(ba) The habitats of indigenous freshwater species, trout and salmon are protected; "	Accept in part
S147.015	Wellington Fish and Game Council	FS20.112	Ātiawa ki Whakarongotai Charitable Trust	FS20.112	Ātiawa ki Whakarongotai Charitable Trust	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	Ātiawa do not support the relief sought where it relates to protecting habitats of trout and salmon without any proviso. Ātiawa refer to Policy 9 and Policy 10 of the NPS-FM to support this statement, which affords indigenous freshwater species greater protection than trout and salmon. Additionally, Ātiawa do not support the protection of trout and salmon which have adverse impacts on indigenous ecosystems. Generally the management and decision making in regards to trout and salmon species has not been undertaken within a Treaty Partnership with mana whenua. To accept the relief sought by the submitter would be contrary to	Disallow Disallow the relief sought in so far as it relates to the protection of trout and salmon.	Accept in part

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								Te Tiriti o Waitangi and the national resource management direction.		
S147.015	Wellington Fish and Game Council	FS19.079	Wellington Water Ltd ("Wellington Water")	FS19.079	Wellington Water Ltd ("Wellington Water")	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part
S147.015	Wellington Fish and Game Council	FS30.184	Beef + Lamb New Zealand Ltd	FS30.184	Beef + Lamb New Zealand Ltd	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept in part

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								been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S157.042	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.042	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	<p>The intent of the policy is supported. However, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p> <p>Editorial changes are required to the wording of clauses (f) and (g) to ensure they relate appropriately to the amended chapeau, which requires Te Mana o te Wai to 'be given effect to'.</p>	<p>amend subclause.</p> <p>(f) requiring the consent holders are required to measure and report the actual amount of water taken; and</p>	Accept

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S157.043	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.043	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	<p>The intent of the policy is supported. However, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p> <p>Editorial changes are required to the wording of clauses (f) and (g) to ensure they relate appropriately to the amended chapeau, which requires Te Mana o te Wai to 'be given effect to'.</p>	<p>amend subclause</p> <p>(g) requiring the consent holders are required to adopt water conservation and demand management measures and demonstrate how water will be used efficiently; and</p>	Accept
S157.044	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd			S157.044	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	<p>The intent of the policy is supported. However, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such</p>	<p>introduce new subclause.(i) appropriate provision is made for temporary dewatering activities necessary for construction or maintenance.</p>	Reject

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								<p>takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p> <p>Editorial changes are required to the wording of clauses (f) and (g) to ensure they relate appropriately to the amended chapeau, which requires Te Mana o te Wai to 'be given effect to'.</p>		
S157.044	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	FS19.048	Wellington Water Ltd ("Wellington Water")	FS19.048	Wellington Water Ltd ("Wellington Water")	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	Agree these works are important but no provision has been made for drinking water source protection.	Disallow	Accept
S163.071	Wairarapa Federated Farmers			S163.071	Wairarapa Federated Farmers	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	<p>As set out in relation to objectives for freshwater. More specifically, any amendments should not apply to s14(3) takes. Refer to submission for more details on other specific concerns.</p> <p>Alternatively, the proposed new overarching Objective B is intended to provide a pathway towards a similar result.</p>	That the amendments to Policy 44 be deleted.	Reject
S163.071	Wairarapa Federated Farmers	FS7.114	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.114	Royal Forest and Bird Protection Society (Forest & Bird)	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month,	<p>Disallow</p> <p>Disallow whole submission</p>	Accept

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								and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.		
S163.071	Wairarapa Federated Farmers	FS20.236	Ātiawa ki Whakarongotai Charitable Trust	FS20.236	Ātiawa ki Whakarongotai Charitable Trust	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept
S163.071	Wairarapa Federated Farmers	FS29.087	Ngā Hapu o Otaki	FS29.087	Ngā Hapu o Otaki	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented. Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy'		Accept

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								aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.		
S163.071	Wairarapa Federated Farmers	FS30.143	Beef + Lamb New Zealand Ltd	FS30.143	Beef + Lamb New Zealand Ltd	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Accept
S165.072	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.072	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Gives effect to the NPSFM Objective and Policies	Retain	Accept in part
S165.072	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on	Disallow	Accept in part

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								communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S168.053	Rangitāne O Wairarapa Inc			S168.053	Rangitāne O Wairarapa Inc	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Restricting the scope of the policy in this way is neither appropriate, efficient or effective, and neither will it give full effect to the NPS FM.	Amend the policy: So that a consistent grammatical tense is used throughout the policy.	Accept in part
S168.053	Rangitāne O Wairarapa Inc	FS31.163	Sustainable Wairarapa inc	FS31.163	Sustainable Wairarapa inc	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further	Not stated	Accept in part

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								<p>submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S169.004	Kahungunu Ki Wairarapa			S169.004	Kahungunu Ki Wairarapa	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	<p>On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise</p>	Retain as notified	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.		
S169.004	Kahungunu Ki Wairarapa	FS31.005	Sustainable Wairarapa inc	FS31.005	Sustainable Wairarapa inc	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S169.014	Kahungunu Ki Wairarapa			S169.014	Kahungunu Ki Wairarapa	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	<p>On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.</p>	Retain as notified.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S169.014	Kahungunu Ki Wairarapa	FS31.015	Sustainable Wairarapa inc	FS31.015	Sustainable Wairarapa inc	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Nga mihi nui Ian Gun		
S170.054	Te Rūnanga o Toa Rangatira			S170.054	Te Rūnanga o Toa Rangatira	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Not Stated / Neutral	Policy 44 Managing water take and use to give effect to Te Mana o Te Wai - consideration This consideration needs to consider the needs of iwi and Māori and should be able to give flexibility to the needs of Mana Whenua.	Policy 44 Managing water take and use to give effect to Te Mana o Te Wai - consideration This consideration needs to consider the needs of iwi and Māori and should be able to give flexibility to the needs of Mana Whenua.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S170.054	Te Rūnanga o Toa Rangatira	FS29.168	Ngā Hapu o Otaki	FS29.168	Ngā Hapu o Otaki	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.		
S167.0110	Taranaki Whānui			S167.0110	Taranaki Whānui	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause: (x) the outcomes defined within Te Mahere Wai o Te Kāhui Taiao are achieved	Reject
S167.0111	Taranaki Whānui			S167.0111	Taranaki Whānui	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause: (x) mana whenua / tangata whenua are partner in resource management and decision making.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S167.0111	Taranaki Whānui	FS6.039	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	FS6.039	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	We support this submission because this will enable better partnership in relation to climate resilient urban areas. This will also mean that mana whenua/ tangata whenua aspirations are upheld.	Allow	Accept
S16.056	Kāpiti Coast District Council			S16.056	Kāpiti Coast District Council	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	<p>Council considers the matters in the policy are important considerations, particularly where new urban development is proposed.</p> <p>We request the use of the verb consideration in the policy heading is transferred into the policy wording to avoid inconsistency with the structure of the RPS and the consideration focus of the policy.</p>	<p>Amend Policy FW.5 as follows:</p> <p>Policy FW.5: Water supply planning for climate change and urban development - consideration When considering a change, variation or review of a regional or district plan particular regard consideration shall be given to:</p> <p>(a) ...</p> <p>Explanation</p> <p>Policy FW.5 requires water supply planning to adequately considered including consider the impacts of climate change and new urban development.</p>	Reject
S25.039	Carterton District Council			S25.039	Carterton District Council	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Retain the policy.	Retain the policy.	Accept in part
S30.068	Porirua City Council			S30.068	Porirua City Council	Policy FW.5: Water supply planning for climate change and urban	Oppose	Council opposes this policy and seeks its deletion. These are matters that are addressed in Long Term Plans, Asset Management Plans, and will be considered in the Wellington region Future Development Strategy. Soon,	Delete policy.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						development - consideration		they are likely to fall within the ambit of the Three waters entity. It is unclear how these requirements align with the existing requirements of the NES for Sources of Human Drinking Water		
S30.068	Porirua City Council	FS25.101	Peka Peka Farm Limited	FS25.101	Peka Peka Farm Limited	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Reject
S34.048	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.048	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Council supports the intent but considers that the policy should be specific to changes, variations or reviews which deal with public potable water supply only.	Amend to read: When considering a change, variation or review of a regional or district plan which includes a requirement for a public potable water supply particular regard shall be given to..... (a) climate change impacts on public potable water supply, including water availability and demand..."	Accept in part
S79.044	South Wairarapa District Council			S79.044	South Wairarapa District Council	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Policy FW.5 does not assist in resolving the numerous conflicts between resources within this plan change. In particular, the ability to deliver long term affordable growth, while significantly increasing environmental protections. Where growth has been planned in conjunction with the community, mana whenua and other stakeholders, the protection and enabling of municipal water takes, subject to te mana o te wai and a range of 'use management' including	Amend Policy FW.5 as follows: When considering a change, variation or review of a regional or district plan particular regard shall be given to: (a) climate change impacts on water supply, including water availability and demand; (b) demand from future population projections, growth strategies adopted by Councils, and the ability to deliver well	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								efficiency measures, should be protected.	<p>functioning urban environments;</p> <p>(c) development of future water sources, storage, treatment and reticulation; and</p> <p>(d) protection of existing and future water sources.</p> <p>Or, similar relief to the same effect;</p> <p>AND;</p> <p>Any consequential amendments to give effect to the relief sought</p>	
S113.039	Wellington Water			S113.039	Wellington Water	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Clause (a) needs to reflect the potential for saline intrusion into the aquifer	(a) climate change impacts on water supply, including water availability and demand, including the potential for saline intrusion into the aquifer;	Accept
S113.039	Wellington Water	FS2.22	Rangitāne o Wairarapa Inc	FS2.22	Rangitāne o Wairarapa Inc	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Rangitāne acknowledges that saline intrusion of aquifers is a potentially significant issue relating to climate change impacts on fresh water. Rangitāne supports the relief sought by the submitter.	Allow	Accept
S113.040	Wellington Water			S113.040	Wellington Water	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Clause (d) needs to reflect ki uta ki tai for protection of water sources	(d) protection of existing and future water sources identified in Source Water Risk Management Plans and including by via a catchment approach (ki uta ki tai).	Accept in part

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S113.040	Wellington Water	FS2.23	Rangitāne o Wairarapa Inc	FS2.23	Rangitāne o Wairarapa Inc	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Rangitāne supports the requested amendment to incorporate the ki uta ki tai approach, but seeks that protection of existing and future water sources is not just restricted to those named in these plans.	Allow in part	Accept
S113.040	Wellington Water	FS28.069	Horticulture New Zealand	FS28.069	Horticulture New Zealand	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose in part	The wording proposed is not sufficiently clear as to how the proposed amendment to (d) would be implemented	Disallow	Accept in part
S113.041	Wellington Water			S113.041	Wellington Water	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	A new clause should be added to support the importance of water demand management in achieving Te Mana o te Wai.	Insert new clause(e) The benefits from, and implications for, water demand management.	Reject
S115.070	Hutt City Council			S115.070	Hutt City Council	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	No reasons given	Retain as notified	Accept in part
S128.044	Horticulture New Zealand			S128.044	Horticulture New Zealand	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	This policy should not just be limited to urban development.	Amend Policy FW.5 as follows:Water supply planning for climate change and urban development - consideration	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S128.045	Horticulture New Zealand			S128.045	Horticulture New Zealand	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Support regard being given to climate change impacts and development of water storage.	Amend as follows:(c) development of future water sources, storage, treatment and reticulation, including water storage schemes ; and	Reject
S128.045	Horticulture New Zealand	FS9.012	Wairarapa Water Users Society	FS9.012	Wairarapa Water Users Society	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Water storage should be supported in both urban and rural environments and not just urban	Not stated As requested by Horticulture NZ with the addition of wording to include both urban and rural environments.	Reject
S128.045	Horticulture New Zealand	FS2.13	Rangitāne o Wairarapa Inc	FS2.13	Rangitāne o Wairarapa Inc	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose in part	Rangitāne supports consideration being given to climate change and water supply. Rangitāne supports the fair and equitable allocation of water to ensure resources are not over allocated and serve current and future needs. The proposed amendment to the text of the Policy is not supported as it is covered by 'water storage' already.	Disallow	Accept in part
S128.045	Horticulture New Zealand	FS21.012	Irrigation NZ	FS21.012	Irrigation NZ	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Water storage should be supported in both urban and rural environments and not just urban	Not stated As requested by Horticulture NZ with the addition of wording to include both urban and rural environments.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.094	Ātiawa ki Whakarongotai Charitable Trust			S131.094	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Ātiawa supports water supply planning for climate change and urban development. Ātiawa is not clear why the approach in the policy only applies to a change, variation, or review of a regional or district plan. Ātiawa seeks that this policy also apply to resource consent applications to ensure that water supply planning is considered as part of resource consent applications.	Amend to: Policy FW.5: Water supply planning for climate change and urban development - consideration When considering an application for resource consent , change, variation or review of a regional or district plan particular regard shall be given to: (a) climate change impacts on water supply, including water availability and demand; (b) demand from future population projections; (c) development of future water sources, storage, treatment and reticulation; and (d) protection of existing and future water sources	Reject
S131.094	Ātiawa ki Whakarongotai Charitable Trust	FS2.65	Rangitāne o Wairarapa Inc	FS2.65	Rangitāne o Wairarapa Inc	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Rangitāne support the amendment to the Policy proposed by Ātiawa and that these matters are given appropriate consideration through the resource consent process.	Allow	Reject

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S131.094	Ātiawa ki Whakarongotai Charitable Trust	FS29.364	Ngā Hapu o Otaki	FS29.364	Ngā Hapu o Otaki	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Reject

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S140.071	Wellington City Council (WCC)			S140.071	Wellington City Council (WCC)	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Support as proposed.	Retain as notified	Accept in part
S144.042	Sustainable Wairarapa Inc			S144.042	Sustainable Wairarapa Inc	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	At present there is no specific work to protect of the water sources for Wairarapa towns in the Tararua Ranges within the DoC estate. DoC, iwi, GWRC and district councils should develop a working arrangement to ensure these water sources receive best practice protection.	Protection of water sources should be achieved by the combined actions of all affected councils and DoC.	Reject
S147.069	Wellington Fish and Game Council			S147.069	Wellington Fish and Game Council	Policy FW.5: Water supply planning for climate change and urban	Support	Necessary to give effect to the NPS-FM.	Retain as notified.	Accept in part

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						development - consideration				
S147.069	Wellington Fish and Game Council	FS19.133	Wellington Water Ltd ("Wellington Water")	FS19.133	Wellington Water Ltd ("Wellington Water")	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part
S147.069	Wellington Fish and Game Council	FS30.238	Beef + Lamb New Zealand Ltd	FS30.238	Beef + Lamb New Zealand Ltd	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet</p>	Disallow That the submission be disallowed with the exception of 147.007	Accept in part

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								the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S163.072	Wairarapa Federated Farmers			S163.072	Wairarapa Federated Farmers	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	Reasons as set out in respect of freshwater objectives. Concerned that the intent appears to be restricted to a concern for urban supplies and urban growth projections - and not rural supplies and primary production values. Refer to submission for more detail. The proposed over-arching Objective B is intended to provide a pathway towards a similar result.	That Policy FW.5 be deleted.	Reject
S163.072	Wairarapa Federated Farmers	FS2.35	Rangitāne o Wairarapa Inc	FS2.35	Rangitāne o Wairarapa Inc	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	Rangitāne opposes the relief sought by the submitter. Current irrigation practices are not consistent with the hierarchy of priorities in Te Mana o te Wai.	Disallow	Accept
S163.072	Wairarapa Federated Farmers	FS7.115	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.115	Royal Forest and Bird Protection Society (Forest & Bird)	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the	Disallow Disallow whole submission	Accept

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								final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.		
S163.072	Wairarapa Federated Farmers	FS20.237	Ātiawa ki Whakarongotai Charitable Trust	FS20.237	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept
S163.072	Wairarapa Federated Farmers	FS29.088	Ngā Hapu o Otaki	FS29.088	Ngā Hapu o Otaki	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented. Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy'	Not stated	Accept

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								aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.		
S163.072	Wairarapa Federated Farmers	FS30.144	Beef + Lamb New Zealand Ltd	FS30.144	Beef + Lamb New Zealand Ltd	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Reject
S165.073	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.073	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose in part	Further amendments are required to ensure this policy meets the NPSFM objective and policies.	Amend the pōtai to Policy FW.5 as follows: When considering a change, variation or review of a regional or district plan give effect to the hierarchy of obligations in Te Mana o te Wai, as set out in Objective 2.1 of the NPSFM 2020 and have particular regard shall be given to:	Accept in part
S165.073	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS2.79	Rangitāne o Wairarapa Inc	FS2.79	Rangitāne o Wairarapa Inc	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Rangitāne support the amendment to Policy FW.5 proposed by Forest & Bird.	Allow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S165.073	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.078	Ātiawa ki Whakarongotai Charitable Trust	FS20.078	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Ātiawa support the relief sought by Forest and Bird	Allow	Accept in part
S165.073	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject
S167.0112	Taranaki Whānui			S167.0112	Taranaki Whānui	Policy FW.5: Water supply planning for climate change and urban	Support	Taranaki Whānui supports the new Policy FW.5	Retain as notified.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						development - consideration				
S30.079	Porirua City Council			S30.079	Porirua City Council	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Oppose	<p>The policy uses terminology inconsistent with national direction, and duplicates other parts of regulations. For example, territorial authorities are required to give effect to NPS-FM 3.5 (4) so it is unclear why this needs to be repeated in an RPS. The RPS needs to provide clear direction on what is exactly required at a regional level in clause (c), rather than just duplicate what is set out in the NPS-FM. At present, it adds no value.</p> <p>The reference to a 10m setback is less stringent than the 100m setback required under the NES-F.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with national direction:</p> <p>Regional and district plans shall recognise and provide for the responsibilities below, when developing objectives, policies and methods, including rules, to protect and enhance the health and well-being of water bodies and freshwater ecosystems:</p> <p>(a) Wellington Regional Council has primary responsibility for freshwater. Wellington Regional Council shall be responsible for the control of the use and development of land for the purposes of water quality and quantity.</p> <p>(b) In relation to wetlands, Wellington Regional Council is responsible for managing land use within, and within a 10m margin 100m setback of natural wetlands as directed by the NES-F 2020, as well as areas adjoining and/or upstream of a wetland for the purpose of protecting wetlands;</p> <p>(c) city and district councils territorial authorities are responsible for the control of land use and subdivision. City and district councils Territorial authorities must include objectives, policies, and methods</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									<p>in district plans to promote positive effects, and avoid, remedy or, or mitigate adverse effects (including cumulative effects) of land use and subdivision on the health and wellbeing of water bodies, freshwater ecosystems and receiving environments (as required by NPS-FM 3.5 (4))</p> <p>They must carry out their responsibility in regard to the NPS-FM through their functions under Section 31 of the RMA and must not duplicate or replicate objectives, policies, rules or other methods that fall under the functions of Wellington Regional Council in a regional plan.</p>	
S30.079	Porirua City Council	FS25.112	Peka Peka Farm Limited	FS25.112	Peka Peka Farm Limited	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part
S34.058	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.058	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	<p>Some of this is already current practice and district plans must give effect to the NPS-FM.</p> <p>Council supports the amendments that move from district councils 'managing discharges' to 'managing land'.</p> <p>However, it is noted that territorial authorities do not have functions to control activities to achieve target</p>	Amend to clarify this is a regional function.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								attributable states or discharge to water.		
S115.082	Hutt City Council			S115.082	Hutt City Council	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Oppose	This policy is redundant as it simply repeats provisions of the RMA and NPS-FM.	Delete Policy FW.6.	Reject
S137.006	Greater Wellington Regional Council (GWRC)			S137.006	Greater Wellington Regional Council (GWRC)	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	Amendments to align with wording in section 30 of the Resource Management Act.	Amend Policy FW.6 as follows: (a) Wellington Regional Council has primary responsibility for freshwater. Wellington Regional Council shall be responsible for the control of the use and development of land for the purposes of maintenance and enhancement of water quality and ecosystems in water bodies, and maintenance of water quantity water quality and quantity.	Accept
S140.083	Wellington City Council (WCC)			S140.083	Wellington City Council (WCC)	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	Clarify that the responsibility of the land use management (earthworks and vegetation clearance) of the riparian margins of water bodies is managed by Regional Councils.	Amend policy to add who is responsible for land use in the riparian margins of a waterbody	Accept
S140.083	Wellington City Council (WCC)	FS19.060	Wellington Water Ltd ("Wellington Water")	FS19.060	Wellington Water Ltd ("Wellington Water")	Policy FW.6: Allocation of responsibilities for land use and development	Support in part	Improved clarity for riparian management would be useful	Allow in part Accept with changes	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						controls for freshwater				
S147.075	Wellington Fish and Game Council			S147.075	Wellington Fish and Game Council	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support	Necessary to give effect to the NPS-FM.	Retain as notified.	Accept in part
S147.075	Wellington Fish and Game Council	FS19.139	Wellington Water Ltd ("Wellington Water")	FS19.139	Wellington Water Ltd ("Wellington Water")	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part
S147.075	Wellington Fish and Game Council	FS30.244	Beef + Lamb New Zealand Ltd	FS30.244	Beef + Lamb New Zealand Ltd	Policy FW.6: Allocation of responsibilities for land use and development	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper	Disallow That the submission be disallowed with the exception of 147.007	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						controls for freshwater		review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S158.030	Kāinga Ora Homes and Communities			S158.030	Kāinga Ora Homes and Communities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	Seeks that this policy is amended to be in line with the NPS-FM and NES-F.	Amend policy to be in line with the NPS-FM and NES-F: (b) In relation to wetlands, Wellington Regional Council is responsible for managing land use within, and within a 100m setback margin of natural wetlands as directed by the NES-F 2020, as well as areas adjoining and/or upstream for the purpose of protecting wetlands	Accept
S158.030	Kāinga Ora Homes and Communities	FS13.037	Wellington City Council	FS13.037	Wellington City Council	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S165.081	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.081	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	The title of the policy suggests that it is aimed only at freshwater. However, (b) applies to 'natural wetlands', which (currently) includes coastal wetlands. Either in this or a separate policy, it should be clarified that the regional council also has responsibility for coastal wetlands. Further, some of the NES regulations (e.g. r52) apply to an area 100m from the natural wetland. It is not clear whether this is clearly captured in the policy.	Either amend this policy, or include in a different policy, the allocation of responsibility for natural wetlands other than freshwater ones. Clarify the policy to accurately reflect the NES regulations, which control works up to 100m from natural wetlands.	Accept in part
S165.081	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS19.036	Wellington Water Ltd ("Wellington Water")	FS19.036	Wellington Water Ltd ("Wellington Water")	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Oppose	There is too much uncertainty about coastal wetlands to include this provision.	Disallow	Accept in part
S165.081	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national	Disallow	Accept in part

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								legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S166.060	Masterton District Council			S166.060	Masterton District Council	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Not Stated / Neutral	In reference to Method 5 - How does this work in practice? How are responsibilities between TA and GWRC distributed? Joint processing - how will this work? Who will manage the process?	Clarifications. Further clarification to address the relief sought	Reject
S168.013	Rangitāne O Wairarapa Inc			S168.013	Rangitāne O Wairarapa Inc	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Not Stated / Neutral	Rangitāne o Wairarapa considers that Policy FW.6 does not provide sufficient clarity or direction on the division of responsibilities. We also believe that freshwater is not just a regional and/or territorial authority responsibility. The management of freshwater should be led by mana whenua, in collaboration with councils. This is provided for by the NPS FM.	Ultimately, we seek that the regional council transfers the management of freshwater to mana whenua (via a mechanism such as a s33 RMA transfer of functions, powers or duties). This would provide a more holistic and integrated 'whole of catchment' approach to enable us to give effect to te Mana o te Wai.	Reject
S168.013	Rangitāne O Wairarapa Inc	FS31.057	Sustainable Wairarapa inc	FS31.057	Sustainable Wairarapa inc	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S168.059	Rangitāne O Wairarapa Inc			S168.059	Rangitāne O Wairarapa Inc	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	<p>In relation to clause b, we note that the Regional Council controls activities within 100m of wetlands for some activities under the NES-F.</p> <p>Clause c does not provide any assistance. It is our position that this needs to explicitly state that the district and city councils' control everything else which is not controlled by the regional council.</p> <p>It is also not clear whether this policy</p>	<p>Amend the policy:</p> <p>So that it accurately reflects the regional councils' responsibilities under the NES-F in relation to wetlands;</p> <p>To explicitly state that district and city councils' control everything else which is not controlled by the regional council.</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>contradicts Policy FW3.</p> <p>Note also our aspirations that ultimately, tangata whenua would have responsibility for managing freshwater, as explained in the general submission points above.</p>		
S168.059	Rangitāne O Wairarapa Inc	FS31.169	Sustainable Wairarapa inc	FS31.169	Sustainable Wairarapa inc	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui Ian Gun		
S131.0106	Ātiawa ki Whakarongotai Charitable Trust			S131.0106	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support	Ātiawa supports the direction provided to the regional and city and district councils through Policy FW.6	Retain as notified	Accept in part
S131.0106	Ātiawa ki Whakarongotai Charitable Trust	FS29.221	Ngā Hapu o Otaki	FS29.221	Ngā Hapu o Otaki	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support	Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community. There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes. This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental	Not stated	Accept in part

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								<p>decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S167.0124	Taranaki Whānui			S167.0124	Taranaki Whānui	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support			Accept in part
S16.073	Kāpiti Coast District Council			S16.073	Kāpiti Coast District Council	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	<p>Council considers water attenuation and retention should be required via regulatory methods. Council notes water attenuation via hydraulic neutrality is a recurring theme within the Whaitua plans that have been completed to date (which do not yet include the Kapiti Coast District).</p> <p>Council notes including water attenuation, retention and hydraulic neutrality requirements in the RPS would assist any city or district council that has included stormwater attenuation provisions in their Intensification Planning Instruments.</p>	Amend to require water attenuation and retention via hydraulic neutrality to be implemented in district plans via regulatory methods.	Reject
S30.084	Porirua City Council			S30.084	Porirua City Council	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	These matters are covered by earlier regulatory and consideration policies, it is unclear how it fits with these or adds more guidance for plan users.	Delete policy, or amend policy so that it provides clear and appropriate direction to plan users in line with objectives.	Reject
S30.084	Porirua City Council	FS25.117	Peka Peka Farm Limited	FS25.117	Peka Peka Farm Limited	Policy FW.7: Water attenuation and retention - non-regulatory	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Reject
S34.059	Te Kaunihera o Te Awa Kairangi ki Uta,			S34.059	Te Kaunihera o Te Awa Kairangi ki Uta,	Policy FW.7: Water attenuation and retention	Support in part	Council supports the need to attenuate and retain water and considers that this should be a regulatory approach, except that the	Retain clauses a) and b) as a non-regulatory means of compliance but include a new regulatory policy that identifies that plan	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
	Upper Hutt City Council				Upper Hutt City Council	- non-regulatory		measures to achieve this should be non-regulatory, particularly given our comments on nature-based solutions.	changes and variations should promote and support water attenuation and retention.	
S78.002	Beef + Lamb New Zealand Limited			S78.002	Beef + Lamb New Zealand Limited	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Supports proposed new Policy FW.7	Retain as notified	Accept in part
S78.002	Beef + Lamb New Zealand Limited	FS9.002	Wairarapa Water Users Society	FS9.002	Wairarapa Water Users Society	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Policy FW.7: Water attenuation and retention - non-regulatory Promote and support water attenuation and retention including: (a) nature based solutions including slowing water down in the landscape and increasing groundwater recharge (riparian management, wetland enhancement/restoration, flood management); and (b) built solutions including storage at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds).	Not stated Retention of total Policy FW.7 to be more consistent with other work being conducted by GWRC and community outside the RPS change 1	Accept in part
S78.002	Beef + Lamb New Zealand Limited	FS21.002	Irrigation NZ	FS21.002	Irrigation NZ	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Policy FW.7: Water attenuation and retention - non-regulatory Promote and support water attenuation and retention including: (a) nature based solutions including slowing water down in the landscape and increasing groundwater recharge (riparian management, wetland enhancement/restoration, flood management); and (b) built solutions including storage at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds).	Not stated Retention of total Policy FW.7 to be more consistent with other work being conducted by GWRC and community outside the RPS change 1	Accept in part
S78.002	Beef + Lamb New Zealand Limited	FS20.310	Ātiawa ki Whakarongotai Charitable Trust	FS20.310	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.7: Water attenuation and retention	Oppose	Ātiawa oppose the entire submission by Beef + Lamb New Zealand Limited. The relief sought by Beef + Lamb is to withdraw all proposed amendments, apart from those which give effect to	Disallow Disallow the relief sought where	Accept in part

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						- non-regulatory		NPS-UD. The basis for deleting the proposed amendments (apart from NPS-UD provisions) is to delay decision-making until further national direction is gazetted or until the scheduled full review of the RPS. Ātiawa do not accept that delaying proposed RPS Change 1 is an appropriate course of action, further delays would permit further degradation of te taiao and continue to have perverse outcomes for mana whenua.	the submitter seeks the deletion of proposed amendments.	
S86.005	Irrigation New Zealand (IrrigationNZ)			S86.005	Irrigation New Zealand (IrrigationNZ)	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Further clarification to be provided to ascertain other types of storage to within sub-clause (b), such as catchment for irrigation purposes, to ensure that primary industries are sufficiently accounted for.	Amendment sub-clause (b) of Policy FW.7 to provide further specification of natural and built solutions to attenuate and retain water to provide adequate provision for primary industries.	Reject
S86.005	Irrigation New Zealand (IrrigationNZ)	FS30.045	Beef + Lamb New Zealand Ltd	FS30.045	Beef + Lamb New Zealand Ltd	Policy FW.7: Water attenuation and retention - non-regulatory	Support	B+LNZ supports water infrastructure that allows for a sustainable and resilient future for New Zealand farmers.	Allow	Reject
S86.005	Irrigation New Zealand (IrrigationNZ)	FS28.084	Horticulture New Zealand	FS28.084	Horticulture New Zealand	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Support clarification such that primary industries are sufficiently accounted for.	Allow	Reject
S86.005	Irrigation New Zealand (IrrigationNZ)	FS9.015	Wairarapa Water Users Society	FS9.015	Wairarapa Water Users Society	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Water storage at a range of sizes and both in and off channel should be promoted at the RPS level as well as all attenuation methods	Not stated Amendment sub-clause (b) of Policy FW.7 to provide further specification of natural and built solutions to attenuate and retain water to provide adequate provision for primary industries. Include references to the RWIP and the WWRS. These work programs and recommendation	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									presented to GWRC that have included in their development the regulator, community and iwi to the extent they wish to be involved are consistent with the requirements for implementation of FW plans and as set out in the NPS Freshwater provisions.	
S102.049	Te Tumu Paeroa Office of the Māori Trustee			S102.049	Te Tumu Paeroa Office of the Māori Trustee	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Policy FW.7 should be a "Matter to be considered", rather than non-regulatory. This will work towards strengthening a change of view and promoting and encouraging ecosystem health.	Amend Policy FW.7 to a 'considered' policy.	Reject
S113.045	Wellington Water			S113.045	Wellington Water	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Clause (b) should be amended to support public health outcomes	Amend clause (b) as follows: (b) built solutions including storage at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds), while ensuring appropriate consideration of public health outcomes.	Accept in part
S115.086	Hutt City Council			S115.086	Hutt City Council	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.	Reject
S128.052	Horticulture New Zealand			S128.052	Horticulture New Zealand	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Support promotion and support of options for water attenuation and retention, such as groundwater recharge and water storage at varying scales. These will be important for climate change resilience.	Retain as notified	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S136.019	DairyNZ			S136.019	DairyNZ	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	<p>Water availability will continue to be a pressing issue for the Greater Wellington region due to both the regulatory implications of implementing Te Mana o te Wai and the increasing pressures of Climate Change.</p> <p>Support Policy FW.7 and would like to see an ambitious and collaborative approach to investing and developing a diverse portfolio of nature based and constructed solutions to water storage in the region. This works could begin prior to any further regulatory changes.</p> <p>Water availability is crucial to most land uses and reliable access to water will create flexible for farmers and the wider community to adapt to climate change.</p>	Delete Policy FW.7 and address the issue through a full review of the RPS.	Reject
S136.019	DairyNZ	FS19.0010	Wellington Water Ltd ("Wellington Water")	FS19.0010	Wellington Water Ltd ("Wellington Water")	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	Te Mana o te Wai will take about a decade to fully realise in planning documents - an incremental approach is as valid as any other.	Disallow	Accept in part
S136.019	DairyNZ	FS9.005	Wairarapa Water Users Society	FS9.005	Wairarapa Water Users Society	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Given the importance of the FW provisions, formally stating that a collaborative approach will be undertaken will help to include all relevant viewpoints.	Not stated	Accept in part
								Retain FW.7 with the addition of an explicit reference to adopting a collaborative approach that includes the regulator, community and iwi to the extent they wish to be involved to setting implementation FW plans and tools to be consistent with the NPS Freshwater provisions.		

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S136.019	DairyNZ	FS21.005	Irrigation NZ	FS21.005	Irrigation NZ	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Given the importance of the FW provisions, formally stating that a collaborative approach will be undertaken will help to include all relevant viewpoints.	Not stated Retain FW.7 with the addition of an explicit reference to adopting a collaborative approach that includes the regulator, community and iwi to the extent they wish to be involved to setting implementation FW plans and tools to be consistent with the NPS Freshwater provisions.	Accept in part
S139.009	Ian Gunn			S139.009	Ian Gunn	Policy FW.7: Water attenuation and retention - non-regulatory	Support	The potential of nature based solutions to slow water down, maintain stream/river base flows reduce sedimentation, improve water quality, improve carbon sequestration etc. There is an opportunity for council to specifically develop prototypes to advance the nature based approach.	Add examples of nature based solutions to the policy eg. more room for rivers, allow temporary shallow flooding outside existing stop banks, resulting increased natural character of waterways. include research and prototyping of nature based solutions. Add to the explanation: Flood management is undergoing a change in approach from hard structures down river to the exploration of NBS up river and on the flood plain. The creation or rehabilitation of wetlands, construction of bunds all have multiple benefits varying to reducing flood peaksto increasing water resilience.	Accept in part
S140.087	Wellington City Council (WCC)			S140.087	Wellington City Council (WCC)	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Support as proposed.	Retain as notified.	Accept in part

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S144.043	Sustainable Wairarapa Inc			S144.043	Sustainable Wairarapa Inc	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Solutions like these need to be built at scale and support is needed to make it easier for landowners. The regions stock water races presently provide some groundwater recharge. Some races have been closed without fully investigating the effect of removing this source of recharge.	Amend clause (a) to expand the examples of nature based solutions to include more detail around flood management, to read" (a) nature based solutions including slowing water down in the landscape and increasing groundwater recharge (riparian management, wetland enhancement/restoration, flood management), giving rivers more room, allowing some temporary, shallow flooding of areas outside existing stop banks and allowing more natural character of waterways ; and	Accept in part
S144.044	Sustainable Wairarapa Inc			S144.044	Sustainable Wairarapa Inc	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Built solutions should be limited to farm scale except if they are solely used for public water supply. Large scale built solutions for water storage are unlikely to give effect to Te Mana o te Wai.	Amend clause (b): (b) built solutions including storage for public water supply at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds).	Reject
S144.045	Sustainable Wairarapa Inc			S144.045	Sustainable Wairarapa Inc	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Researching and prototyping nature-based solutions will provide evidence of the benefits to landowners and encourage them to invest in these solutions.	Promote and support could be expanded to include researching and prototyping nature-based solutions.	Reject
S144.046	Sustainable Wairarapa Inc			S144.046	Sustainable Wairarapa Inc	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	The regions stock water races presently provide some groundwater recharge. Some races have been closed without fully investigating the effect of removing this source of recharge.	To include maintaining and enhancing the groundwater recharging capacity of the region's stock water races.	Reject
S144.047	Sustainable Wairarapa Inc			S144.047	Sustainable Wairarapa Inc	Policy FW.7: Water attenuation and retention	Support in part	Existing legislation makes it difficult to build bunds because resource consents may be needed. Solutions like these need to be built at scale	Add information relating to legislative change to support non-regulatory policies.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						- non-regulatory		and support is needed to make it easier for landowners.		
S144.061	Sustainable Wairarapa Inc			S144.061	Sustainable Wairarapa Inc	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Flood management, particularly in times of small freshes in the rivers during the summer, has potential to provide water resilience by storing water in the landscape. It could also reduce flood peaks in rivers	Provide for opportunities for increased recharge (e.g. in times when there are freshes in the rivers).	Reject
S145.003	Wairarapa Water Users Society			S145.003	Wairarapa Water Users Society	Policy FW.7: Water attenuation and retention - non-regulatory	Support	The recognition of both Nature-based and built solutions is vital in allowing water to assist in achieving community wellbeing in Wairarapa and the rest of the region. The aim of this new Policy echo's the principles in the Wairarapa Water Resilience Strategy. The Wairarapa Water Users Society believes the foundations laid by this policy would be enhanced if it became an Objective.	Retain as notified.	Accept in part
S145.003	Wairarapa Water Users Society	FS21.013	Irrigation NZ	FS21.013	Irrigation NZ	Policy FW.7: Water attenuation and retention - non-regulatory	Support	The recognition of both nature-based and built water capture and storage solutions is vital in allowing water to assist in achieving community wellbeing in Wairarapa and the rest of the region.	Not stated The RPS change 1 should in general recognize the significant community input into the Ruamahanga Whaitua and the Wairarapa Water Resilience Strategy. Both of these documents have been accepted by GWRC.	Accept in part
S147.080	Wellington Fish and Game Council			S147.080	Wellington Fish and Game Council	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.	Accept in part

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S147.080	Wellington Fish and Game Council	FS19.144	Wellington Water Ltd ("Wellington Water")	FS19.144	Wellington Water Ltd ("Wellington Water")	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part
S147.080	Wellington Fish and Game Council	FS30.249	Beef + Lamb New Zealand Ltd	FS30.249	Beef + Lamb New Zealand Ltd	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept in part

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								climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S163.083	Wairarapa Federated Farmers			S163.083	Wairarapa Federated Farmers	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Supports the intent of the policy, which is consistent with Ruamahanga WIP recommendations, the Wairarapa Water Resilience Strategy and the recent MPI report "Water Availability and Security". However, concern that it is non-regulatory. The proposed over-arching Objective B is intended to recognise the importance of this matter, and to provide a concrete pathway towards achieving it.	That the intent of Policy FW.7 be retained and expressed as an objective.	Reject
S163.083	Wairarapa Federated Farmers	FS28.085	Horticulture New Zealand	FS28.085	Horticulture New Zealand	Policy FW.7: Water attenuation and retention - non-regulatory	Support	HortNZ support this provision being expressed as an objective (or a policy), recognising the importance of water attenuation and retention.	Allow Allow relief	Reject
S163.083	Wairarapa Federated Farmers	FS9.008	Wairarapa Water Users Society	FS9.008	Wairarapa Water Users Society	Policy FW.7: Water attenuation and retention - non-regulatory	Support	That due recognition is given to the community driven processes that resulted in the Ruamahanga Whaitua Implementation Plan and the Wairarapa Water Resilience Strategy	Not stated That the wording of Policy FW7 is amended to include references to the RWIP and the WWRS. These work programs and recommendation presented to GWRC that have included in their development the regulator, community and iwi to the extent they wish to be involved are consistent with the requirements for implementation of FW plans and as set out in the NPS Freshwater provisions.	Reject

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S163.083	Wairarapa Federated Farmers	FS21.008	Irrigation NZ	FS21.008	Irrigation NZ	Policy FW.7: Water attenuation and retention - non-regulatory	Support	That due recognition is given to the community driven processes that resulted in the Ruamahanga Whaitua Implementation Plan and the Wairarapa Water Resilience Strategy	Not stated That the wording of Policy FW7 is amended to include references to the RWIP and the WWRS. These work programs and recommendation presented to GWRC that have included in their development the regulator, community and iwi to the extent they wish to be involved are consistent with the requirements for implementation of FW plans and as set out in the NPS Freshwater provisions.	Reject
S163.083	Wairarapa Federated Farmers	FS7.126	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.126	Royal Forest and Bird Protection Society (Forest & Bird)	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept
S163.083	Wairarapa Federated Farmers	FS20.248	Ātiawa ki Whakarongotai Charitable Trust	FS20.248	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept

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								compound environmental and resource management issues.		
S163.083	Wairarapa Federated Farmers	FS29.099	Ngā Hapu o Otaki	FS29.099	Ngā Hapu o Otaki	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated	Accept
S163.083	Wairarapa Federated Farmers	FS30.155	Beef + Lamb New Zealand Ltd	FS30.155	Beef + Lamb New Zealand Ltd	Policy FW.7: Water attenuation and retention - non-regulatory	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024.	Allow	Reject

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								Where alternative relief is provided, B+LNZ generally support this relief.		
S165.087	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.087	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part		'Nature based solutions' should be italicised.	Accept
S165.087	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject
S168.060	Rangitāne O Wairarapa Inc			S168.060	Rangitāne O Wairarapa Inc	Policy FW.7: Water attenuation and retention	Support in part	Rangitāne o Wairarapa consider this policy needs amending so that it is clear who the policy is directed at. It should also be made clearer as to what flood management methods are	Amend the policy: So that it is clearer who this policy is directed at;	Accept in part

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						- non-regulatory		considered nature-based solutions, as built or engineered flood management solutions would not fit within this definition.	To be clearer as to what types of flood management are considered 'nature based solutions'.	
S168.060	Rangitāne O Wairarapa Inc	FS31.170	Sustainable Wairarapa inc	FS31.170	Sustainable Wairarapa inc	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We	Not stated	Accept in part

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								<p>are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S131.0112	Ātiawa ki Whakarongotai Charitable Trust			S131.0112	Ātiawa ki Whakarongotai Charitable Trust	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Ātiawa supports the Regional Council promoting and supporting natural and built solutions to attenuate and retain water.	Retain as notified.	Accept in part
S131.0112	Ātiawa ki Whakarongotai Charitable Trust	FS29.228	Ngā Hapu o Otaki	FS29.228	Ngā Hapu o Otaki	Policy FW.7: Water attenuation and retention - non-regulatory	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers</p>	Not stated	Accept in part

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								<p>insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S167.0130	Taranaki Whānui			S167.0130	Taranaki Whānui	Policy FW.7: Water attenuation and retention	Support	Taranaki Whānui supports Policy FW.7	Retain as notified.	Accept in part

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						- non-regulatory				
S168.0180	Rangitāne O Wairarapa Inc			S168.0180	Rangitāne O Wairarapa Inc	Policy FW.7: Water attenuation and retention - non-regulatory	Support	The inclusion of nature-based solutions for attenuation and retention is supported.	Retain as notified.	Accept in part
S168.0180	Rangitāne O Wairarapa Inc	FS31.110	Sustainable Wairarapa inc	FS31.110	Sustainable Wairarapa inc	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further	Not stated	Accept in part

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								<p>explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S128.055	Horticulture New Zealand			S128.055	Horticulture New Zealand	Method FW.1: Freshwater Action Plans	Support in part	<p>Support the development of Freshwater Action Plans as part of the NPSFM 2020 approach, this should also involve communities.</p>	Amend as follows:Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua, and with communities as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP,...	Accept
S144.049	Sustainable Wairarapa Inc			S144.049	Sustainable Wairarapa Inc	Method FW.1: Freshwater Action Plans	Support	Support the date set for these plans.	Retain as notified.	Accept in part
S147.088	Wellington Fish and Game Council			S147.088	Wellington Fish and Game Council	Method FW.1: Freshwater Action Plans	Support in part	<p>Disappointed that implementation of the NOF contained in Part 3, Subpart 2, of the NPS-FM has been deferred. Without full implementation of this framework Proposed Change 1 fails to give effect to this central element of the NPS-FM, which is urgently required to avoid adverse effects on the environment.</p> <p>Considers that Freshwater Action Plans must be adopted as a matter of priority and absolutely no later than December 2026 deadline proposed.</p> <p>Further supports the intention to ensure that mana whenua/tangata whenua values are properly</p>	<p>Amend.</p> <p>Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua and stakeholders, and in consultation with landowners and community, 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. [etc]..."</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>recognised and provided for in the Action Plans and their role as kaitiaki is supported.</p> <p>At the same time, however, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment is intended to achieve this outcome.</p>		
S147.088	Wellington Fish and Game Council	FS19.152	Wellington Water Ltd ("Wellington Water")	FS19.152	Wellington Water Ltd ("Wellington Water")	Method FW.1: Freshwater Action Plans	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part
S147.088	Wellington Fish and Game Council	FS30.257	Beef + Lamb New Zealand Ltd	FS30.257	Beef + Lamb New Zealand Ltd	Method FW.1: Freshwater Action Plans	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S163.089	Wairarapa Federated Farmers			S163.089	Wairarapa Federated Farmers	Method FW.1: Freshwater Action Plans	Oppose	Defer to the upcoming NRP changes in 2023 whitua) and 2024 (rural whitua).	That Method FW.1 be deleted	Reject
S163.089	Wairarapa Federated Farmers	FS7.132	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.132	Royal Forest and Bird Protection Society (Forest & Bird)	Method FW.1: Freshwater Action Plans	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow whole submission	Accept
S163.089	Wairarapa Federated Farmers	FS20.254	Ātiawa ki Whakarongotai Charitable Trust	FS20.254	Ātiawa ki Whakarongotai Charitable Trust	Method FW.1: Freshwater Action Plans	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept

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								proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.		
S163.089	Wairarapa Federated Farmers	FS29.105	Ngā Hapu o Otaki	FS29.105	Ngā Hapu o Otaki	Method FW.1: Freshwater Action Plans	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated	Accept
S163.089	Wairarapa Federated Farmers	FS30.161	Beef + Lamb New Zealand Ltd	FS30.161	Beef + Lamb New Zealand Ltd	Method FW.1: Freshwater Action Plans	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.		
S165.097	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.097	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Method FW.1: Freshwater Action Plans	Support		Retain	Accept in part
S165.097	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Method FW.1: Freshwater Action Plans	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Reject

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S168.064	Rangitāne O Wairarapa Inc			S168.064	Rangitāne O Wairarapa Inc	Method FW.1: Freshwater Action Plans	Support in part	Rangitāne o Wairarapa support this method.	Amend the method so that the second to last and last sentences do not contradict each other.	Reject
S168.064	Rangitāne O Wairarapa Inc	FS31.174	Sustainable Wairarapa inc	FS31.174	Sustainable Wairarapa inc	Method FW.1: Freshwater Action Plans	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread	Not stated	Reject

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								<p>support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S170.069	Te Rūnanga o Toa Rangatira			S170.069	Te Rūnanga o Toa Rangatira	Method FW.2	Not Stated / Neutral	As a method, it does not say much about the involvement of Tangata Whenua. This could be something that Tangata Whenua would want to co-design.	Amend the provision to allow for co-design from tangata whenua.	Reject
S170.069	Te Rūnanga o Toa Rangatira	FS29.183	Ngā Hapu o Otaki	FS29.183	Ngā Hapu o Otaki	Method FW.2	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		

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S170.070	Te Rūnanga o Toa Rangatira			S170.070	Te Rūnanga o Toa Rangatira	Method FW.2	Not Stated / Neutral	It is not clear what role Tangata Whenua has in this process.	Amend the provision to clarify role of tangata whenua in this process.	Reject
S170.070	Te Rūnanga o Toa Rangatira	FS29.184	Ngā Hapu o Otaki	FS29.184	Ngā Hapu o Otaki	Method FW.2	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		
S131.0117	Ātiawa ki Whakarongotai Charitable Trust			S131.0117	Ātiawa ki Whakarongotai Charitable Trust	Method FW.1: Freshwater Action Plans	Support	<p>Ātiawa support the preparation of freshwater action plans, in accordance with the NPS-FM. Ātiawa also support mana whenua partnering with Regional Council to prepare freshwater action plans. Ātiawa seek that this partnership model is enabled through funding/resourcing. It is not clear when a freshwater action plan would not be required as part of the NPS-FM which sets out the framework for all freshwater management. Ātiawa seek minor changes in keeping with the NPS-FM text and a deletion of the last</p>	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 may describe both regulatory measures and non-regulatory measure to achieve target attribute states. Mana whenua are enabled to partner with the Regional Council through adequate funding and	Accept in part

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								sentence which seems to be redundant (all freshwater management must be in accordance with the NPS-FM).	resourcing. will outline non-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.	
S131.0117	Ātiawa ki Whakarongotai Charitable Trust	FS29.233	Ngā Hapu o Otaki	FS29.233	Ngā Hapu o Otaki	Method FW.1: Freshwater Action Plans	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p>	Not stated	Accept in part

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								<p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S167.0141	Taranaki Whānui			S167.0141	Taranaki Whānui	Method FW.1: Freshwater Action Plans	Support in part	<p>Taranaki Whānui support the inclusion of this method.</p> <p>Taranaki Whānui would like to see clear statements on the resourcing/funding and capability building of mana whenua partners included in the description.</p>	Retain as notified.	Accept in part

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S30.093	Porirua City Council			S30.093	Porirua City Council	Method FW.2: Joint processing urban development consents	Oppose	<p>The term "urban development" is not defined nor is there a scale or other threshold to be applied before joint processing is required. As drafted, the method would capture applications that are limited notified.</p> <p>Policy needs to be retitled to tie in to freshwater if this is to be a FW method. Also it is unclear why joint processing would only be appropriate for urban and RSI consents, and not for large-scale rural consents.</p>	<p>Amend method as follows"</p> <p>Method FW.2: Joint processing of urban development resource consents urban development which impact on freshwater When processing resource consents that may impact on freshwater, the Wellington Regional Council, district and city councils territorial authorities shall:</p> <p>(a) jointly process notified resource consents (where both regional and district consents are publicly notified) for urban development and regionally significant infrastructure;</p> <p>(b) encourage resource consent applicants to engage with mana whenua / tangata whenua early in their planning</p> <p>(c) collaborate on pre-application processes;</p> <p>(d) collaborate on the processing of non-notified resource consents;</p> <p>(e) collaborate on monitoring of consent conditions; and</p> <p>(f) exchange information and data to support integrated management. Implementation: Wellington Regional Council, district and city councils territorial authorities</p>	Accept in part
S30.093	Porirua City Council	FS25.126	Peka Peka Farm Limited	FS25.126	Peka Peka Farm Limited	Method FW.2: Joint	Support	The submission provides a comprehensive analysis of the	Allow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						processing urban development consents		proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.		
S78.023	Beef + Lamb New Zealand Limited			S78.023	Beef + Lamb New Zealand Limited	Method FW.2: Joint processing urban development consents	Not Stated / Neutral	Accepts that Proposed Method FW.2 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified	Accept in part
S147.093	Wellington Fish and Game Council	FS20.331	Ātiawa ki Whakarongotai Charitable Trust	FS20.331	Ātiawa ki Whakarongotai Charitable Trust	Method FW.2: Joint processing urban development consents	Oppose	Ātiawa oppose the entire submission by Beef + Lamb New Zealand Limited. The relief sought by Beef + Lamb is to withdraw all proposed amendments, apart from those which give effect to NPS-UD. The basis for deleting the proposed amendments (apart from NPS-UD provisions) is to delay decision-making until further national direction is gazetted or until the scheduled full review of the RPS. Ātiawa do not accept that delaying proposed RPS Change 1 is an appropriate course of action, further delays would permit further degradation of te taiao and continue to have perverse outcomes for mana whenua.	Disallow Disallow the relief sought where the submitter seeks the deletion of proposed amendments.	Accept in part
S115.099	Hutt City Council			S115.099	Hutt City Council	Method FW.2: Joint processing urban development consents	Oppose	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Delete new Method FW.2	Reject
S129.040	Waka Kotahi NZ Transport Agency			S129.040	Waka Kotahi NZ Transport Agency	Method FW.2: Joint processing urban	Support	Supports Method FW.2(a) and the coordinated and collaborative approach proposed by this method point as it will enable well-functioning urban development that aligns with	Retain as notified.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						development consents		the future development strategies and the regional aspirations.		
S129.041	Waka Kotahi NZ Transport Agency			S129.041	Waka Kotahi NZ Transport Agency	Method FW.2: Joint processing urban development consents	Support	Supports Method FW.2(a) as it is consistent with expectations for engagement with our iwi partners.	Retain as notified.	Accept in part
S147.093	Wellington Fish and Game Council			S147.093	Wellington Fish and Game Council	Method FW.2: Joint processing urban development consents	Support	Necessary to implement the NPS-FM.	Retain as notified.	Accept in part
S147.093	Wellington Fish and Game Council	FS19.157	Wellington Water Ltd ("Wellington Water")	FS19.157	Wellington Water Ltd ("Wellington Water")	Method FW.2: Joint processing urban development consents	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part

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S147.093	Wellington Fish and Game Council	FS30.262	Beef + Lamb New Zealand Ltd	FS30.262	Beef + Lamb New Zealand Ltd	Method FW.2: Joint processing urban development consents	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Accept in part
S168.065	Rangitāne O Wairarapa Inc			S168.065	Rangitāne O Wairarapa Inc	Method FW.2: Joint processing urban development consents	Support	Rangitāne o Wairarapa support this method, in particular early engagement with tangata whenua.	Retain as notified.	Accept in part

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S168.065	Rangitāne O Wairarapa Inc	FS31.175	Sustainable Wairarapa inc	FS31.175	Sustainable Wairarapa inc	Method FW.2: Joint processing urban development consents	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S170.089	Te Rūnanga o Toa Rangatira			S170.089	Te Rūnanga o Toa Rangatira	Method FW.1	Not Stated / Neutral	It is not clear what role Tangata Whenua has in this process.	Amend the provision to clarify role of tangata whenua in this process.	Reject
S170.089	Te Rūnanga o Toa Rangatira	FS29.203	Ngā Hapu o Otaki	FS29.203	Ngā Hapu o Otaki	Method FW.1	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>		
S131.0125	Ātiawa ki Whakarongotai Charitable Trust			S131.0125	Ātiawa ki Whakarongotai Charitable Trust	Method FW.2: Joint processing urban development consents	Support	Ātiawa support Method FW.2, particularly sub-clause (b). In addition, we seek that local authorities engage early with mana whenua.	Insert subclause: (ba) engage early with mana whenua	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.0125	Ātiawa ki Whakarongotai Charitable Trust	FS29.242	Ngā Hapu o Otaki	FS29.242	Ngā Hapu o Otaki	Method FW.2: Joint processing urban development consents	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S140.0102	Wellington City Council (WCC)			S140.0102	Wellington City Council (WCC)	Method FW.2: Joint processing urban development consents	Support	Support as proposed.	Retain as notified.	Accept in part
S165.0105	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.0105	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Method FW.2: Joint processing urban development consents	Support		Retain	Accept in part
S165.0105	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Method FW.2: Joint processing urban development consents	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S167.0152	Taranaki Whānui			S167.0152	Taranaki Whānui	Method FW.2: Joint processing urban development consents	Support in part	<p>Taranaki Whānui note the new method is focused on joint processing of resource consents for urban development.</p> <p>At (b) is the provision to 'encourage resource consent applicants to engage with mana whenua / tangata whenua. Taranaki Whānui require a discussion as to the impacts of replacing the word encourage with require.</p> <p>Taranaki Whānui can't fully appreciate the impact without a further discussion with officers.</p>	Amend clause (b) to read: (b) encourage require resource consent applicants to engage with mana whenua / tangata whenua early in their planning	Reject
S78.025	Beef + Lamb New Zealand Limited			S78.025	Beef + Lamb New Zealand Limited	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Not Stated / Neutral	Accepts that the amendment to operative Method 30 is required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S78.025	Beef + Lamb New Zealand Limited	FS20.333	Ātiawa ki Whakarongotai Charitable Trust	FS20.333	Ātiawa ki Whakarongotai Charitable Trust	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Oppose	Ātiawa oppose the entire submission by Beef + Lamb New Zealand Limited. The relief sought by Beef + Lamb is to withdraw all proposed amendments, apart from those which give effect to NPS-UD. The basis for deleting the proposed amendments (apart from NPS-UD provisions) is to delay decision-making until further national direction is gazetted or until the scheduled full review of the RPS. Ātiawa do not accept that delaying proposed RPS Change 1 is an appropriate course of action, further delays would permit further degradation of te taiao and continue to have perverse outcomes for mana whenua.	Disallow Disallow the relief sought where the submitter seeks the deletion of proposed amendments.	Accept in part
S102.085	Te Tumu Paeroa Office of the Māori Trustee			S102.085	Te Tumu Paeroa Office of the Māori Trustee	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Support	Generally supports the methods to implement for the 'Coastal Environment' chapter.	Retain as notified.	Accept in part
S147.094	Wellington Fish and Game Council			S147.094	Wellington Fish and Game Council	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Support	Necessary to implement the NPS-FM.	Retain as notified.	Accept in part
S147.094	Wellington Fish and Game Council	FS19.158	Wellington Water Ltd ("Wellington Water")	FS19.158	Wellington Water Ltd ("Wellington Water")	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Oppose	It is unnecessary and redundant to recreate NPSFM policies within the RPS. Most of the amendments sought do not in any event properly reflect the NPSFM.	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>		
S147.094	Wellington Fish and Game Council	FS30.263	Beef + Lamb New Zealand Ltd	FS30.263	Beef + Lamb New Zealand Ltd	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	Disallow That the submission be disallowed with the exception of 147.007	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.0127	Ātiawa ki Whakarongotai Charitable Trust			S131.0127	Ātiawa ki Whakarongotai Charitable Trust	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Support in part	Ātiawa recognise that the Porirua Harbour is not within Ātiawa ki Whakarongotai rohe, the only comment from Ātiawa on this Method is that Regional Council should work in partnership with Porirua mana whenua to develop and implement the Porirua Harbour Catchment Strategy, if this is desired by mana whenua.	This partnership should be enabled by funding and resourcing through the Regional Council	Accept in part
S131.0127	Ātiawa ki Whakarongotai Charitable Trust	FS29.244	Ngā Hapu o Otaki	FS29.244	Ngā Hapu o Otaki	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S78.026	Beef + Lamb New Zealand Limited			S78.026	Beef + Lamb New Zealand Limited	Method 31: Protocol for management of earthworks and air quality between local authorities	Not Stated / Neutral	Accepts that the deletion of operative Method 31 is required to give effect to the NPS-UD but neither supports nor opposes this deletion.	Delete as notified	Reject
S78.026	Beef + Lamb New Zealand Limited	FS20.334	Ātiawa ki Whakarongotai Charitable Trust	FS20.334	Ātiawa ki Whakarongotai Charitable Trust	Method 31: Protocol for management of earthworks and air quality	Oppose	Ātiawa oppose the entire submission by Beef + Lamb New Zealand Limited. The relief sought by Beef + Lamb is to withdraw all proposed amendments, apart from those which give effect to NPS-UD. The basis for deleting the proposed amendments (apart from	Disallow Disallow the relief sought where the submitter seeks the deletion of proposed amendments.	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
						between local authorities		NPS-UD provisions) is to delay decision-making until further national direction is gazetted or until the scheduled full review of the RPS. Ātiawa do not accept that delaying proposed RPS Change 1 is an appropriate course of action, further delays would permit further degradation of te taiao and continue to have perverse outcomes for mana whenua.		
S115.0102	Hutt City Council			S115.0102	Hutt City Council	Method 31: Protocol for management of earthworks and air quality between local authorities	Support	Support the deletion of this method	Delete Method 31 as proposed.	Reject
S131.0128	Ātiawa ki Whakarongotai Charitable Trust			S131.0128	Ātiawa ki Whakarongotai Charitable Trust	Method 31: Protocol for management of earthworks and air quality between local authorities	Oppose	It is unclear the reasoning for the proposed deletion of Method 31. In particular Ātiawa are concerned that the deletion of the method will result in these effects not being addressed and properly managed.	Retain operative version of Method 31.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S131.0128	Ātiawa ki Whakarongotai Charitable Trust	FS29.245	Ngā Hapu o Otaki	FS29.245	Ngā Hapu o Otaki	Method 31: Protocol for management of earthworks and air quality between local authorities	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S140.0105	Wellington City Council (WCC)			S140.0105	Wellington City Council (WCC)	Method 31: Protocol for management of earthworks and air quality between local authorities	Support	Support as proposed.	Retain as notified.	Reject
S167.0155	Taranaki Whānui			S167.0155	Taranaki Whānui	Method 31: Protocol for management of earthworks and air quality between local authorities	Support	Taranaki Whānui notes the deletion of Method 31 and new 'Amended Method 32' to reflect partnering with mana whenua / tangata whenua in the identification and protection of significant values.	Retain as notified.	Reject
S34.038	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.038	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Method 34: Prepare a regional water supply strategy	Support in part	This method is supported in principle, but it is unclear which mechanism territorial authorities would use to give effect to the measures identified in this method, and how this will work within the context of three waters reform.	Review and amend method to address these issues and ensure that responsibilities can feasibly be supported under the RMA. Amend g) to read "developing methods to protect future and	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									existing public potable water supply sources"	
S86.006	Irrigation New Zealand (IrrigationNZ)			S86.006	Irrigation New Zealand (IrrigationNZ)	Method 34: Prepare a regional water supply strategy	Support in part	The importance of a regional water strategy and its direct relationship to the quality and quantity of freshwater has been underestimated. There needs to be a greater emphasis on the importance of water storage as part of future resilience. Under Method 34, biodiversity and cultural factors are the only considerations, with no mention of wider factors, such as primary industry. The aims of a regional water supply plan should take direction from the Wairarapa Water Resilience Strategy (WWRS).	Amend Method 34 to place a greater emphasis on the importance of water storage as part of a resilient regional water supply strategy.	Reject
S86.006	Irrigation New Zealand (IrrigationNZ)	FS30.046	Beef + Lamb New Zealand Ltd	FS30.046	Beef + Lamb New Zealand Ltd	Method 34: Prepare a regional water supply strategy	Support	B+LNZ agrees that Regional Policy Statements need to place emphasis on the importance of water infrastructure to support a sustainable and resilient future for New Zealand farmers. B+LNZ agree that method 34 should consider water security for primary production.	Allow	Reject
S86.006	Irrigation New Zealand (IrrigationNZ)	FS28.086	Horticulture New Zealand	FS28.086	Horticulture New Zealand	Method 34: Prepare a regional water supply strategy	Support	HortNZ support the need to consider the role of water storage as part of a water supply strategy	Allow Allow amendment to place a greater emphasis on the importance of water storage as part of a resilient regional water supply strategy	Reject
S86.006	Irrigation New Zealand (IrrigationNZ)	FS9.016	Wairarapa Water Users Society	FS9.016	Wairarapa Water Users Society	Method 34: Prepare a regional water supply strategy	Support	Provides recognition of the community input that resulted in the RWIP and the WWRS	Not stated Amend Method 34 to place a greater emphasis on the importance of water storage as part of a resilient regional water supply strategy. This will also be consistent with the recommendations and actions set	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									out in the National Climate Adaptation Plan 2022.	
S113.046	Wellington Water			S113.046	Wellington Water	Method 34: Prepare a regional water supply strategy	Support in part	Wellington Water supports the concept of a regional water supply strategy, with changes. e.g. Taumata Arowai are also regulating in this space.	Amend Method 34 to: <ul style="list-style-type: none"> Align with Taumata Arowai guidance. Refer to 'use of water', rather than 'allocation', in clause (a). Update the method to reflect the potential for water reform. Address whether (and/or how) the strategy will still be relevant if water reform occurs. Reflect public health concerns regarding alternate water supplies in urban areas. Address water scarcity, operational resilience, growth and Te Mana o te Wai as part of clause (d). Give effect to water safety plans and other requirements of Taumata Arowai as appropriate. Apply ki uta ki tai to source protection. 	Accept in part
S128.057	Horticulture New Zealand			S128.057	Horticulture New Zealand	Method 34: Prepare a regional water supply strategy	Support in part	Support the development of a regional water supply strategy, this could cover both urban and rural communities, a minor amendment is sought clarify that.	Amend as follows:(d) secure sustainable water supplies for urban and rural communities across the region, preparing for climate change;	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S144.050	Sustainable Wairarapa Inc			S144.050	Sustainable Wairarapa Inc	Method 34: Prepare a regional water supply strategy	Support	The vast majority of the public water supplies are sourced from the ranges. It is important to shield this source from natural hazards. This will require management to ensure the fabric of the ranges is maintained. Also that understanding where possible new sources may be tapped will require substantial investigation. At present there is no specific work to protect the water sources for Wairarapa towns in the Tararua Ranges within the DoC estate. DoC, iwi, GWRC and district councils should develop a working arrangement to ensure these water sources receive best practice protection.	Retain as notified.	Accept in part
S144.050	Sustainable Wairarapa Inc	FS14.042	Masterton District Council	FS14.042	Masterton District Council	Method 34: Prepare a regional water supply strategy	Support	Agree with: The vast majority of the public water supplies are sourced from the ranges. It is important to shield this source from natural hazards. This will require management to ensure the fabric of the ranges is maintained. Also that understanding where possible new sources may be tapped will require substantial investigation. At present there is no specific work to protect the water sources for Wairarapa towns in the Tararua Ranges within the DoC estate. DoC, iwi, GWRC and district councils should develop a working arrangement to ensure these water sources receive best practice protection	Not stated Agree with relief sought: Retain as notified	Accept in part
S147.095	Wellington Fish and Game Council			S147.095	Wellington Fish and Game Council	Method 34: Prepare a regional water supply strategy	Support	Necessary to implement the NPS-FM.	Retain as notified.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.095	Wellington Fish and Game Council	FS19.159	Wellington Water Ltd ("Wellington Water")	FS19.159	Wellington Water Ltd ("Wellington Water")	Method 34: Prepare a regional water supply strategy	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Reject
S147.095	Wellington Fish and Game Council	FS30.264	Beef + Lamb New Zealand Ltd	FS30.264	Beef + Lamb New Zealand Ltd	Method 34: Prepare a regional water supply strategy	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S163.094	Wairarapa Federated Farmers			S163.094	Wairarapa Federated Farmers	Method 34: Prepare a regional water supply strategy	Oppose	<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>	That the amendments to Method 32 be deleted.	Reject
S163.094	Wairarapa Federated Farmers	FS28.087	Horticulture New Zealand	FS28.087	Horticulture New Zealand	Method 34: Prepare a regional water supply strategy	Support in part	HortNZ agree that the amendments to the policy reduce the ability to consider rural water supply strategy	<p>Allow in part</p> <p>Allow amendment to ensure address rural water supply is considered</p>	Reject
S163.094	Wairarapa Federated Farmers	FS7.137	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.137	Royal Forest and Bird Protection Society (Forest & Bird)	Method 34: Prepare a regional water supply strategy	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	<p>Disallow</p> <p>Disallow whole submission</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S163.094	Wairarapa Federated Farmers	FS20.259	Ātiawa ki Whakarongotai Charitable Trust	FS20.259	Ātiawa ki Whakarongotai Charitable Trust	Method 34: Prepare a regional water supply strategy	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part
S163.094	Wairarapa Federated Farmers	FS29.110	Ngā Hapu o Otaki	FS29.110	Ngā Hapu o Otaki	Method 34: Prepare a regional water supply strategy	Oppose	Section 18, page 4: General Comments - OPPOSE Section 25, Page 5 Going Forward - OPPOSE It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented. Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S163.094	Wairarapa Federated Farmers	FS30.166	Beef + Lamb New Zealand Ltd	FS30.166	Beef + Lamb New Zealand Ltd	Method 34: Prepare a regional water supply strategy	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow	Reject
S166.068	Masterton District Council			S166.068	Masterton District Council	Method 34: Prepare a regional water supply strategy	Not Stated / Neutral	Further clarity is required with regard to implementation and transitional arrangements for Entity C (three waters)	Clarifications.	Accept
S168.062	Rangitāne O Wairarapa Inc			S168.062	Rangitāne O Wairarapa Inc	Method 34: Prepare a regional water supply strategy	Support in part	Rangitāne o Wairarapa support this method.	Reword clause f and g so that they fit grammatically with the opening clause.	Accept
S168.062	Rangitāne O Wairarapa Inc	FS31.172	Sustainable Wairarapa inc	FS31.172	Sustainable Wairarapa inc	Method 34: Prepare a regional water supply strategy	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further	Not stated	Accept

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								<p>submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p> <p>Nga mihi nui</p> <p>Ian Gun</p>		
S170.073	Te Rūnanga o Toa Rangatira			S170.073	Te Rūnanga o Toa Rangatira	Method 34: Prepare a regional water supply strategy	Not Stated / Neutral	No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	Clarify how these methods will impact iwi, hāpu and Māori.	Reject

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S170.073	Te Rūnanga o Toa Rangatira	FS29.187	Ngā Hapu o Otaki	FS29.187	Ngā Hapu o Otaki	Method 34: Prepare a regional water supply strategy	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making - Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 - Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.		
S115.0105	Hutt City Council			S115.0105	Hutt City Council	Method 34: Prepare a regional water supply strategy	Oppose in part	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.	Accept
S131.0131	Ātiawa ki Whakarongotai Charitable Trust			S131.0131	Ātiawa ki Whakarongotai Charitable Trust	Method 34: Prepare a regional water supply strategy	Support	Ātiawa supports Method 34.	Retain as notified.	Accept in part

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S131.0131	Ātiawa ki Whakarongotai Charitable Trust	FS29.249	Ngā Hapu o Otaki	FS29.249	Ngā Hapu o Otaki	Method 34: Prepare a regional water supply strategy	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept in part

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S140.0108	Wellington City Council (WCC)			S140.0108	Wellington City Council (WCC)	Method 34: Prepare a regional water supply strategy	Support in part	Water allocation and efficiency is Regional Council responsibility.	Amend Method 34 so that it does not apply to city and district councils.	Accept
S165.0109	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.0109	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Method 34: Prepare a regional water supply strategy	Support in part	The development of the strategy should provide for engagement with stakeholders and the community.	Amend the provision as follows: Add "and engaging with stakeholders and the community" after the words "tangata whenua".	Accept in part
S165.0109	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS28.088	Horticulture New Zealand	FS28.088	Horticulture New Zealand	Method 34: Prepare a regional water supply strategy	Support	HortNZ's support engaging with stakeholders and the community for the preparation of a water supply strategy	Allow Allow relief	Accept in part
S165.0109	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS20.079	Ātiawa ki Whakarongotai Charitable Trust	FS20.079	Ātiawa ki Whakarongotai Charitable Trust	Method 34: Prepare a regional water supply strategy	Oppose	Ātiawa seek to ensure the relationship between the partnership between mana whenua and local authorities is upheld as provided for by Te Tiriti o Waitangi.	Disallow	Accept in part

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S165.0109	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Method 34: Prepare a regional water supply strategy	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept in part
S167.0158	Taranaki Whānui			S167.0158	Taranaki Whānui	Method 34: Prepare a regional water supply strategy	Support	Taranaki Whānui support the inclusion of this method and in particular note the requirement to partner with mana whenua. Taranaki Whānui want to indicate our intention to partner with council in the development of this strategy.	Retain as notified.	Accept in part
S78.027	Beef + Lamb New Zealand Limited			S78.027	Beef + Lamb New Zealand Limited	Method 35: Prepare a regional stormwater action plan	Not Stated / Neutral	Accepts that the deletion of operative Method 35 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified	Reject

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S78.027	Beef + Lamb New Zealand Limited	FS20.335	Ātiawa ki Whakarongotai Charitable Trust	FS20.335	Ātiawa ki Whakarongotai Charitable Trust	Method 35: Prepare a regional stormwater action plan	Oppose	Ātiawa oppose the entire submission by Beef + Lamb New Zealand Limited. The relief sought by Beef + Lamb is to withdraw all proposed amendments, apart from those which give effect to NPS-UD. The basis for deleting the proposed amendments (apart from NPS-UD provisions) is to delay decision-making until further national direction is gazetted or until the scheduled full review of the RPS. Ātiawa do not accept that delaying proposed RPS Change 1 is an appropriate course of action, further delays would permit further degradation of te taiao and continue to have perverse outcomes for mana whenua.	Disallow Disallow the relief sought where the submitter seeks the deletion of proposed amendments.	Accept
S115.0106	Hutt City Council			S115.0106	Hutt City Council	Method 35: Prepare a regional stormwater action plan	Support	No reasons given	Retain as notified	Reject
S131.0132	Ātiawa ki Whakarongotai Charitable Trust			S131.0132	Ātiawa ki Whakarongotai Charitable Trust	Method 35: Prepare a regional stormwater action plan	Oppose	It is not clear why the Regional Council have proposed to delete Method 35. Ātiawa are concerned that if Method 35 is deleted from the regional policy statement there will be no mechanism to prepare a regional approach to stormwater management. Ātiawa position is that stormwater management in regards to water quality forms a part of Regional Councils functions under section 30 (f) of the RMA.	Retain operative version of Method 35.	Accept in part

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S131.0132	Ātiawa ki Whakarongotai Charitable Trust	FS29.250	Ngā Hapu o Otaki	FS29.250	Ngā Hapu o Otaki	Method 35: Prepare a regional stormwater action plan	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept in part

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								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S140.0109	Wellington City Council (WCC)			S140.0109	Wellington City Council (WCC)	Method 35: Prepare a regional stormwater action plan	Support	Support as proposed.	Retain as notified.	Reject
S167.0159	Taranaki Whānui			S167.0159	Taranaki Whānui	Method 35: Prepare a regional stormwater action plan	Not Stated / Neutral		Deleted method	Reject
S30.096	Porirua City Council			S30.096	Porirua City Council	Method 48: Water allocation policy review	Support in part	Policy should be time bound to increase clarity and regulatory certainty.	Amend policy so that it is timebound.	Reject
S30.096	Porirua City Council	FS25.129	Peka Peka Farm Limited	FS25.129	Peka Peka Farm Limited	Method 48: Water allocation policy review	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary	Allow	Reject

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								submission or this further submission by Peka Peka Farm Ltd.		
S102.051	Te Tumu Paeroa Office of the Māori Trustee			S102.051	Te Tumu Paeroa Office of the Māori Trustee	Method 48: Water allocation policy review	Support in part	Supports the review of the water allocation policy in the regional policy statement, particularly alternative solutions to a first in first served policy which has historically disadvantaged Māori landowners. However, considers 'rights and interests' do not recognise the full extent of Māori rights, interests and responsibilities in freshwater, including the preservation of those rights and interests. Therefore, there is an express need to include 'responsibilities' to guarantee Māori rights, interests and responsibilities in freshwater are appropriately recognised and provided for.	Amend Method 48 clause (e) as follows: (e) provide for iwi, hapū and Māori landowners rights, and interests and responsibilities ;	Accept in part
S113.047	Wellington Water			S113.047	Wellington Water	Method 48: Water allocation policy review	Support in part	The method lacks clarity, appears to have clauses with similar intents and does not have an overarching purpose. e.g. Clause (c) and (d) are duplicates. Clauses (f) and (g) are duplicates. Clauses (i) and (j) are redundant.	Amend Method 48 to: <ul style="list-style-type: none"> • Clause (a) - refer to 'appropriate allocation' rather than 'efficient allocation'. • Delete either clause (c) or (d). • Clarify how transferable permits relate to improved water allocation. • Clarify what alternatives to 'first in, first served' will be considered. • Delete either clause (f) or (g). • Relate clause (h) to water allocation rather than climate change. • Delete clauses (i) and (j). 	Accept in part

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S113.047	Wellington Water	FS28.089	Horticulture New Zealand	FS28.089	Horticulture New Zealand	Method 48: Water allocation policy review	Oppose in part	HortNZ support clarity amendments, but seek to retain the consideration of transferable permits as a method of improving allocation efficiency and climate resilient land use.	Disallow in part Disallow relief seeking deletion of (d) and (i)	Accept in part
S128.059	Horticulture New Zealand			S128.059	Horticulture New Zealand	Method 48: Water allocation policy review	Support in part	A minor amendment to (i) is sought to align with overall climate direction.	Amend as follows:(i) land use change to lower emissions or more climate resilient uses is promoted	Reject
S128.060	Horticulture New Zealand			S128.060	Horticulture New Zealand	Method 48: Water allocation policy review	Support in part	Coherence is lacking in subclauses (c), (d), (g) and (h): in how they link to the "Review water allocation policy in the regional plan so that:" statement.	correct grammatical errors in (c), (d), (g) and (h)	Accept
S136.021	DairyNZ			S136.021	DairyNZ	Method 48: Water allocation policy review	Oppose in part	<p>Water availability will continue to be a pressing issue for the Greater Wellington region due to both the regulatory implications of implementing Te Mana o te Wai and the increasing pressures of Climate Change.</p> <p>Support an ambitious and collaborative approach to investing and developing a diverse portfolio of nature based and constructed solutions to water storage in the region. This works could begin prior to any further regulatory changes.</p> <p>Water availability is crucial to most land uses and reliable access to water will create flexible for farmers and the wider community to adapt to climate change.</p> <p>These issues should be a key priority to be addressed in the review and this work should align with the review of the NRP in 2023/2024.</p>	Delete Method 48 and address the issue through a full review of the RPS.	Reject
S136.021	DairyNZ	FS19.011	Wellington Water Ltd	FS19.011	Wellington Water Ltd ("Wellington Water")	Method 48: Water	Oppose	Te Mana o te Wai will take about a decade to fully realise in planning	Disallow	Accept in part

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			("Wellington Water")			allocation policy review		documents - an incremental approach is as valid as any other.		
S136.021	DairyNZ	FS9.006	Wairarapa Water Users Society	FS9.006	Wairarapa Water Users Society	Method 48: Water allocation policy review	Support in part	Given the importance of the FW provisions, formally stating that a collaborative approach will be undertaken will help to include all relevant viewpoints.	Not stated Retain Method 48 with the addition of an explicit reference to adopting a collaborative approach that includes the regulator, community and iwi to the extent they wish to be involved to setting implementation FW plans and tools to be consistent with the NPS Freshwater provisions.	Reject
S136.021	DairyNZ	FS21.006	Irrigation NZ	FS21.006	Irrigation NZ	Method 48: Water allocation policy review	Support in part	Given the importance of the FW provisions, formally stating that a collaborative approach will be undertaken will help to include all relevant viewpoints.	Not stated Retain Method 48 with the addition of an explicit reference to adopting a collaborative approach that includes the regulator, community and iwi to the extent they wish to be involved to setting implementation FW plans and tools to be consistent with the NPS Freshwater provisions.	Reject
S144.051	Sustainable Wairarapa Inc			S144.051	Sustainable Wairarapa Inc	Method 48: Water allocation policy review	Support	Support transferable permits and alternatives to first-in first-served, which can help improve water allocation efficiency.	Retain as notified.	Accept
S145.004	Wairarapa Water Users Society			S145.004	Wairarapa Water Users Society	Method 48: Water allocation policy review	Oppose	The consideration of alternatives to the "first in first served" principle in the RMA would seem to be beyond the remit of a Regional Council. If a new fundamental principle is proposed, this should be left to Central Government as they hold the power to create law. This would also seem to cut across the overall review of the RMA that is currently underway with the	Amend Method 48 to remove (f) OR If the provision is retained, any review process should include having the current water users at the table with the ability to provide information and influence the decisions made. A factor in the consideration of	Reject

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								Government. The potential exists for this change from "first in first served" to be applied to existing consents, particularly if the Council believes that the current consents create an unfair allocation.	alternatives needs to be the value of assets that may become "stranded" if access to water is reduced or removed.	
S168.063	Rangitāne O Wairarapa Inc			S168.063	Rangitāne O Wairarapa Inc	Method 48: Water allocation policy review	Oppose in part	Rangitāne o Wairarapa do not support the 'first in first served' allocation method, as this has resulted in widespread degradation of our wai and an inability of our whānau, hapū and iwi to exercise tino rangatiratanga. We consider this method should be rejected outright, and that other alternatives should be explored. The method is not sufficiently clear as to what might constitute 'equitable allocation'.	Amend the provision: So that it is grammatically correct and consistent, as currently not all clauses flow appropriately from the introduction. To reference alternative allocation principles as alternatives to the 'first in first served' allocation method; So that the 'first in first served' allocation method is rejected outright; To clarify what is meant by 'equitable allocation' in this context.	Accept in part
S168.063	Rangitāne O Wairarapa Inc	FS28.090	Horticulture New Zealand	FS28.090	Horticulture New Zealand	Method 48: Water allocation policy review	Support in part	HortNZ support editorial corrections. It is appropriate for the review to consider allocation methods.	Allow in part Allow relief that provides clarity as to the review directed by the policy	Accept in part

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S168.063	Rangitāne O Wairarapa Inc	FS31.173	Sustainable Wairarapa inc	FS31.173	Sustainable Wairarapa inc	Method 48: Water allocation policy review	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi- Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission.</p>	Not stated	Accept in part

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								Nga mihi nui Ian Gun		
S131.0143	Ātiawa ki Whakarongotai Charitable Trust			S131.0143	Ātiawa ki Whakarongotai Charitable Trust	Method 48: Water allocation policy review	Support in part	Ātiawa support the intent of Method 48 - water allocation is a significant resource management issue for Ātiawa and Ātiawa are keen to see water allocation addressed in a way that gives effect to the NPS-FM 2020 (including Te Mana o te Wai), as well as providing for mana whenua rights and interests in water, and overall providing for the well-being of the water and sustainable use of water.	Review water allocation policy in the regional plan so that: (a) freshwater is allocated and used efficiently; (b) all existing over-allocation is phased out and future overallocation is avoided; (c) avoid allocating water beyond a limit; (d) improve water allocation efficiency- including transferable permits; (e) provide for iwi and hapū rights and interests; (f) alternatives to first in first served are considered; (g) provide for equitable allocation; (h) adapt to climate change; (i) land use change to more	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									<p>climate resilient uses is promoted;</p> <p>(j) government direction on water allocation is considered; and</p> <p>(k) all matters regarding giving effect to the NPS-FM are provided for considered</p>	
S131.0143	Ātiawa ki Whakarongotai Charitable Trust	FS29.262	Ngā Hapu o Otaki	FS29.262	Ngā Hapu o Otaki	Method 48: Water allocation policy review	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our</p>	Not stated	Reject

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								<p>intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		
S147.0102	Wellington Fish and Game Council			S147.0102	Wellington Fish and Game Council	Method 48: Water allocation policy review	Support	Necessary to implement the NPS-FM.	Retain as notified.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.0102	Wellington Fish and Game Council	FS19.166	Wellington Water Ltd ("Wellington Water")	FS19.166	Wellington Water Ltd ("Wellington Water")	Method 48: Water allocation policy review	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept in part
S147.0102	Wellington Fish and Game Council	FS30.271	Beef + Lamb New Zealand Ltd	FS30.271	Beef + Lamb New Zealand Ltd	Method 48: Water allocation policy review	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S163.0101	Wairarapa Federated Farmers			S163.0101	Wairarapa Federated Farmers	Method 48: Water allocation policy review	Oppose	Defer water allocation matters to the 2024 RPS review. More information on the reasons for rejecting this method is in the submission.	That the amendments to Method 48 be deleted.	Reject
S163.0101	Wairarapa Federated Farmers	FS7.041	Royal Forest and Bird Protection Society (Forest & Bird)	FS7.041	Royal Forest and Bird Protection Society (Forest & Bird)	Method 48: Water allocation policy review	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow Disallow whole submission	Accept in part
S163.0101	Wairarapa Federated Farmers	FS20.163	Ātiawa ki Whakarongotai Charitable Trust	FS20.163	Ātiawa ki Whakarongotai Charitable Trust	Method 48: Water allocation policy review	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further	Disallow Disallow the entire submission by Wairarapa Federated Farmers.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								compound environmental and resource management issues.		
S163.0101	Wairarapa Federated Farmers	FS29.014	Ngā Hapu o Otaki	FS29.014	Ngā Hapu o Otaki	Method 48: Water allocation policy review	Oppose	<p>Section 18, page 4: General Comments - OPPOSE</p> <p>Section 25, Page 5 Going Forward - OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated	Accept in part
S163.0101	Wairarapa Federated Farmers	FS30.070	Beef + Lamb New Zealand Ltd	FS30.070	Beef + Lamb New Zealand Ltd	Method 48: Water allocation policy review	Support	<p>B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024.</p>	Allow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Where alternative relief is provided, B+LNZ generally support this relief.		
S165.0117	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.0117	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Method 48: Water allocation policy review	Support in part	<p>This method should have a realistic date by which it must be achieved.</p> <p>Several of the paragraphs don't make grammatical sense and need amendment.</p>	<p>Add a date by which this method must be achieved. Correct grammar.</p> <p>Amend (k) to ensure that the NPSFM is in fact given effect to:</p> <p>(k) all matters regarding giving effect to the NPS-FM are considered and implemented</p>	Reject
S165.0117	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	Method 48: Water allocation policy review	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S167.0175	Taranaki Whānui			S167.0175	Taranaki Whānui	Method 48: Water allocation policy review	Support	<p>Taranaki Whānui supports this method and the absolute need to review the first in first served allocation regime.</p> <p>Taranaki Whānui support providing for iwi and hapū rights and interests, and equitable allocation. We also agree that over-allocation must be phased out.</p> <p>In giving effect to the NPS-FM and therefore Te Mana o te Wai, Taranaki Whānui are keen to partner with regional council on this policy review.</p>	Retain as notified.	Accept in part
S131.0152	Ātiawa ki Whakarongotai Charitable Trust			S131.0152	Ātiawa ki Whakarongotai Charitable Trust	Objective 12 Freshwater Anticipated environmental results	Support	<p>Ātiawa support the overall intent of the AER to monitor freshwater planning provisions. Ātiawa seek further AER be included to ensure that mana whenua involvement in resource management is assessed and therefore those AER action is taken to achieve those AER.</p>	<p>Ātiawa make the following comments and relief sought: Include a timeframe for Freshwater AER #1 (Objective 12).</p> <p>That is when will over-allocation be phased out, this ensures the AER is bound to a timeframe to achieve this outcome, rather than being open-ended, which can result in slow uptake of the provision. Additionally including a timeframe is in keeping with the national direction (NPS-FM). Freshwater quality and quantity in the Wellington Region is managed in accordance with the principles of Te Mana o Te Wai and over allocation in relation to both the quantity and quality of freshwater is phased out as soon as possible over time.</p> <p>Include the following AER to the kaupapa 'Freshwater': Mana whenua and Regional Council work in partnership in the management of freshwater in</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
									the Wellington region. This partnership provides for governance and operational input into all aspects of resource management to address freshwater, including decision-making. Mana whenua values including their relationship with their culture, ancestral lands, water, sites, wāhi tapu and other taonga are protected and provided for. Mātauranga Māori is applied where appropriate, in accordance with tikanga and kawa, as guided by mana whenua.	
S131.0152	Ātiawa ki Whakarongotai Charitable Trust	FS29.272	Ngā Hapu o Otaki	FS29.272	Ngā Hapu o Otaki	Objective 12 Freshwater Anticipated environmental results	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent</p>	Not stated	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S167.0186	Taranaki Whānui			S167.0186	Taranaki Whānui	Objective 12 Freshwater Anticipated environmental results	Not Stated / Neutral	<p>Support in partnership (resourcing/funding) with mana whenua.</p> <p>Taranaki Whānui are keen to understand the process to establish the AERs.</p> <p>What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>	Amend anticipated environmental results in partnership with mana whenua	Reject
S131.0153	Ātiawa ki Whakarongotai Charitable Trust			S131.0153	Ātiawa ki Whakarongotai Charitable Trust	Objective 13 Freshwater Anticipated environmental results	Support	Ātiawa support the overall intent of the AER to monitor freshwater planning provisions.	Retain as notified	Accept
S131.0153	Ātiawa ki Whakarongotai Charitable Trust	FS29.273	Ngā Hapu o Otaki	FS29.273	Ngā Hapu o Otaki	Objective 13 Freshwater Anticipated environmental results	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the</p>	Not stated	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>		

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S147.0105	Wellington Fish and Game Council			S147.0105	Wellington Fish and Game Council	Objective 13 Freshwater Anticipated environmental results	Support in part	<p>Strongly support this objective. However, the statement of environmental outcomes requires amendment in order to fully give effect to the NPS-FM, particularly Policy 10, the emphasis on interconnectedness in Part 3.5, and the attributes in Appendix A.2.</p> <p>The proposed amendments are intended to address this deficiency.</p> <p>In addition, anticipated environmental result 4 is weakly worded, and would benefit from the specification of increased 'valued' species diversity to eliminate the potential for pest species such as gambusia to give false indications of improved biodiversity.</p>	<p>amend.</p> <p>1. Macro-invertebrate diversity and sensitive macroinvertebrate taxa abundance in rivers and lakes is maintained improving across the Region.</p>	Accept
S147.0105	Wellington Fish and Game Council	FS19.169	Wellington Water Ltd ("Wellington Water")	FS19.169	Wellington Water Ltd ("Wellington Water")	Objective 13 Freshwater Anticipated environmental results	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.0105	Wellington Fish and Game Council	FS30.274	Beef + Lamb New Zealand Ltd	FS30.274	Beef + Lamb New Zealand Ltd	Objective 13 Freshwater Anticipated environmental results	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Reject
S147.0106	Wellington Fish and Game Council			S147.0106	Wellington Fish and Game Council	Objective 13 Freshwater Anticipated environmental results	Support in part	Anticipated environmental result 4 is weakly worded, and would benefit from the specification of increased 'valued' species diversity to eliminate the potential for pest species such as gambusia to give false indications of improved biodiversity.	amend.4. Existing fish habitat, fish populations and the diversity of valued fish fauna is maintained or increased across the region.	Accept
S147.0106	Wellington Fish and Game Council	FS20.119	Ātiawa ki Whakarongotai Charitable Trust	FS20.119	Ātiawa ki Whakarongotai Charitable Trust	Objective 13 Freshwater Anticipated environmental results	Oppose	Ātiawa do not support the relief sought where it relates to protecting habitats of trout and salmon without any provisio. Ātiawa refer to Policy 9 and Policy 10 of the NPS-FM to support this statement, which affords indigenous freshwater species greater protection that trout and salmon.	Disallow Disallow the relief sought in so far as it relates to the protection of trout and salmon.	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Additionally, Ātiawa do not support the protection of trout and salmon which have adverse impacts on indigenous ecosystems. Generally the management and decision making in regards to trout and salmon species has not been undertaken within a Treaty Partnership with mana whenua. To accept the relief sought by the submitter would be contrary to Te Tiriti o Waitangi and the national resource management direction.		
S147.0106	Wellington Fish and Game Council	FS19.170	Wellington Water Ltd ("Wellington Water")	FS19.170	Wellington Water Ltd ("Wellington Water")	Objective 13 Freshwater Anticipated environmental results	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Reject
S147.0106	Wellington Fish and Game Council	FS30.275	Beef + Lamb New Zealand Ltd	FS30.275	Beef + Lamb New Zealand Ltd	Objective 13 Freshwater Anticipated environmental results	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of</p>	<p>Disallow</p> <p>That the submission be disallowed with the exception of 147.007</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.		
S147.0107	Wellington Fish and Game Council			S147.0107	Wellington Fish and Game Council	Objective 13 Freshwater Anticipated environmental results	Support in part	<p>Strongly support this objective. However, the statement of environmental outcomes requires amendment in order to fully give effect to the NPS-FM, particularly Policy 10, the emphasis on interconnectedness in Part 3.5, and the attributes in Appendix A.2.</p> <p>The proposed amendments are intended to address this deficiency.</p> <p>In addition, anticipated environmental result 4 is weakly worded, and would benefit from the specification of increased 'valued' species diversity to eliminate the potential for pest species such as gambusia to give false indications of improved biodiversity.</p>	<p>amend.</p> <p>5. There is no loss of the significant amenity and recreational values or significant indigenous ecosystems and habitats with significant biodiversity or other values associated with the rivers and lakes identified in Appendix 1.</p>	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.0107	Wellington Fish and Game Council	FS20.120	Ātiawa ki Whakarongotai Charitable Trust	FS20.120	Ātiawa ki Whakarongotai Charitable Trust	Objective 13 Freshwater Anticipated environmental results	Oppose	<p>Ātiawa do not support the relief sought where it relates to protecting habitats of trout and salmon without any proviso. Ātiawa refer to Policy 9 and Policy 10 of the NPS-FM to support this statement, which affords indigenous freshwater species greater protection than trout and salmon. Additionally, Ātiawa do not support the protection of trout and salmon which have adverse impacts on indigenous ecosystems. Generally the management and decision making in regards to trout and salmon species has not been undertaken within a Treaty Partnership with mana whenua. To accept the relief sought by the submitter would be contrary to Te Tiriti o Waitangi and the national resource management direction.</p>	<p>Disallow</p> <p>Disallow the relief sought in so far as it relates to the protection of trout and salmon.</p>	Accept
S147.0107	Wellington Fish and Game Council	FS19.171	Wellington Water Ltd ("Wellington Water")	FS19.171	Wellington Water Ltd ("Wellington Water")	Objective 13 Freshwater Anticipated environmental results	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow	Accept

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S147.0107	Wellington Fish and Game Council	FS30.276	Beef + Lamb New Zealand Ltd	FS30.276	Beef + Lamb New Zealand Ltd	Objective 13 Freshwater Anticipated environmental results	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Accept
S167.0187	Taranaki Whānui			S167.0187	Taranaki Whānui	Objective 13 Freshwater Anticipated environmental results	Not Stated / Neutral	Support in partnership (resourcing/funding) with mana whenua. Taranaki Whānui are keen to understand the process to establish the AERs. What input has come from mana whenua? Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga	Amend anticipated environmental results in partnership with mana whenua	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								Māori. (State of Environment Reports).		
S131.0154	Ātiawa ki Whakarongotai Charitable Trust			S131.0154	Ātiawa ki Whakarongotai Charitable Trust	Objective 14 Freshwater Anticipated environmental results	Support	Ātiawa support the overall intent of the AER to monitor freshwater planning provisions.	Ātiawa make the following comments and relief sought: Include a timeframe for Freshwater AER #1 (Objective 14). That is when will over-allocation be phased out, this ensures the AER is bound to a timeframe to achieve this outcome, rather than being open-ended, which can result in slow uptake of the provision. Additionally including a timeframe is in keeping with the national direction (NPS-FM). Freshwater quality and quantity in the Wellington Region is managed in accordance with the principles of Te Mana o Te Wai and over allocation in relation to both the quantity and quality of freshwater is phased out as soon as possible over time.	Accept in part
S131.0154	Ātiawa ki Whakarongotai Charitable Trust	FS2.68	Rangitāne o Wairarapa Inc	FS2.68	Rangitāne o Wairarapa Inc	Objective 14 Freshwater Anticipated environmental results	Support	Rangitāne support the amendment to the Objective proposed by Ātiawa.	Allow	Accept in part
S131.0154	Ātiawa ki Whakarongotai Charitable Trust	FS19.006	Wellington Water Ltd ("Wellington Water")	FS19.006	Wellington Water Ltd ("Wellington Water")	Objective 14 Freshwater Anticipated environmental results	Oppose	Oppose inclusion of 'as soon as possible' as this work will take decades.	Disallow	Accept in part

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S131.0154	Ātiawa ki Whakarongotai Charitable Trust	FS29.274	Ngā Hapu o Otaki	FS29.274	Ngā Hapu o Otaki	Objective 14 Freshwater Anticipated environmental results	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access - Support in Principal</p> <p>3.6 Indigenous Ecosystems - Support in Principal</p> <p>3.9 Regional Form, Design and Function - Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like</p>	Not stated	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.		
S147.0108	Wellington Fish and Game Council			S147.0108	Wellington Fish and Game Council	Objective 14 Freshwater Anticipated environmental results	Support	Necessary to implement the NPS-FM	Retain as notified.	Accept in part
S147.0108	Wellington Fish and Game Council	FS19.172	Wellington Water Ltd ("Wellington Water")	FS19.172	Wellington Water Ltd ("Wellington Water")	Objective 14 Freshwater Anticipated environmental results	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM.</p> <p>In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant</p>	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								provisions or PC1 as notified. Some of the amendments undermine the more detailed content of PC1.		
S147.0108	Wellington Fish and Game Council	FS30.277	Beef + Lamb New Zealand Ltd	FS30.277	Beef + Lamb New Zealand Ltd	Objective 14 Freshwater Anticipated environmental results	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow That the submission be disallowed with the exception of 147.007	Accept in part
S167.0188	Taranaki Whānui			S167.0188	Taranaki Whānui	Objective 14 Freshwater Anticipated environmental results	Not Stated / Neutral	Support in partnership (resourcing/funding) with mana whenua. Taranaki Whānui are keen to understand the process to establish the AERs.	Amend anticipated environmental results in partnership with mana whenua	Reject

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								<p>What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>		
S113.051	Wellington Water			S113.051	Wellington Water	Hydrological controls	Oppose	<p>The purpose of the definition is unclear. The intent might be better served by creation of a policy, rather than a definition.</p> <p>The following issues need to be addressed:</p> <ul style="list-style-type: none"> • The definition refers to annual means rather than annual peaks • The practicability test for brownfield and infill developments may be better served with a more specific target • It is unclear whether the modelling is based on an undeveloped state or the surrounding catchment also being in an undeveloped state? This would affect water flowing onto the site and water attenuation • It is unclear what purpose the (a) clauses serve. The (b) clauses re to address stream scour that adversely impacts aquatic ecosystem health. If the (a) clauses are trying to achieve a different outcome to the (b) clauses, then this should be reflected in the policies. Currently the policies are only referring to one outcome, related to stream form. 	<p>The following issues need to be addressed:</p> <ul style="list-style-type: none"> • Refer to annual means rather than annual peaks • Include a more specific target in the practicability test for brownfield and infill developments. • Clarify whether modelling is based on an undeveloped state or the surrounding catchment also being in an undeveloped state. • Clarify the purpose of clause (a) and how it is different to clause (b) <p>OR</p> <p>Create as a policy, rather than a definition.</p>	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S113.051	Wellington Water	FS13.044	Wellington City Council	FS13.044	Wellington City Council	Hydrological controls	Not Stated / Neutral	Consistent with Wellington City Council's position on the matter.	Allow	Accept in part
S30.0106	Porirua City Council			S30.0106	Porirua City Council	Hydrological controls	Support	<p>Council opposes this definition and seeks its deletion for the following reasons:</p> <ul style="list-style-type: none"> • It is drafted as a rule or standard rather than a definition and requires a level of assessment and judgement inappropriate for a definition. • It lacks the necessary specificity required for a definition to enable effective and efficient implementation in a regulatory framework (district plan and regional plan). 	Delete definition, or amend so that it provides clear and appropriate direction to plan uses.	Accept in part
S30.0106	Porirua City Council	FS25.022	Peka Peka Farm Limited	FS25.022	Peka Peka Farm Limited	Hydrological controls	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part
S34.0101	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.0101	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Hydrological controls	Not Stated / Neutral	<p>'Undeveloped state' is not defined but is referred to regarding hydrological controls for greenfield and brownfield developments.</p> <p>Would a site which has been cleared and infrastructure included still considered to be undeveloped? Or which has buildings etc, which must be removed to develop into the final land use?</p>	Include definition of 'undeveloped state'.	Accept
S140.0123	Wellington City Council (WCC)			S140.0123	Wellington City Council (WCC)	Hydrological controls	Support in part	Definition of 'Hydrological controls' does not provide a definition, rather it provides guidance for how	Add a new method using the current proposed definition of hydrological controls; and	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								hydrological controls should be implemented.	Add a new definition of hydrological controls.	
S25.009	Carterton District Council			S25.009	Carterton District Council	General comments - fresh water	Oppose	As stated above, CDC considers that it is inappropriate to apply the Freshwater Planning Process to provisions where freshwater is not the primary issue. CDC therefore requests that the FPP is only used for provisions in this chapter, and all other Plan Change 1 amendments are addressed via the Schedule 1 process.	Use the Freshwater Planning Process for the provisions in this chapter only, where freshwater is the primary issue, and use the Schedule 1 process for all remaining provisions.	Accept in part
S25.009	Carterton District Council	FS28.019	Horticulture New Zealand	FS28.019	Horticulture New Zealand	General comments - fresh water	Support	HortNZ agree that the Freshwater Planning Process should be applied only to freshwater provisions in the manner described by the High Court.	Allow review/amendment (where required) to use the Freshwater Planning Process only where freshwater is the primary issue.	Accept in part
S31.001	Robert Anker			S31.001	Robert Anker	General comments - fresh water	Oppose	The document contains the Fresh Water indicator in numerous places and whilst in some cases there is a clear linkage to NPS-FM there are many where the linkage is tenuous at best. The preamble specifies the criteria for determining the scope of a freshwater planning instrument - namely that there should be a direct relationship to freshwater quality or quantity. Council has indicated which parts of Change 1 meet at least one of the tests now required to form part of a freshwater planning instrument. This process and logic have not been applied in a consistent fashion.	Examine the document and remove the FW indicator from those parts of the document where it fails to meet the specified criteria. Those parts will not comply with the scope of a freshwater planning instrument but will fall under a Section 1 process.	Accept in part
S31.001	Robert Anker	FS2.128	Rangitāne o Wairarapa Inc	FS2.128	Rangitāne o Wairarapa Inc	General comments - fresh water	Oppose in part	The te Ao Maori worldview does not recognise these arbitrary distinctions. Whatever process is chosen, it is critical that all relevant provisions are considered in an integrated manner.	Disallow in part	Accept in part

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S62.007	Philip Clegg			S62.007	Philip Clegg	General comments - fresh water	Oppose in part	<p>The proposed RPS contains references to the Fresh Water indicator in numerous places and whilst in some cases there is a clear linkage to NPS-FM there are many where the linkage is tenuous at best.</p> <p>Concerns that the criteria listed in the preamble for determining the scope of a freshwater planning instrument - namely that there should be a direct relationship to freshwater quality or quantity - have not been applied in a consistent way throughout Plan Change 1.</p>	Remove references to the Fresh Water indicator from those parts of the document that don't meet the criteria specified in the preamble.	Accept in part
S96.003	Sarah (Dr) Kerkin			S96.003	Sarah (Dr) Kerkin	General comments - fresh water	Oppose in part	<p>The proposed RPS contains references to the Fresh Water indicator in numerous places and whilst in some cases there is a clear linkage to NPS-FM there are many where the linkage is tenuous at best.</p> <p>Concerns that the criteria listed in the preamble for determining the scope of a freshwater planning instrument - namely that there should be a direct relationship to freshwater quality or quantity - have not been applied in a consistent way throughout Plan Change 1.</p>	Remove references to the Fresh Water indicator from those parts of the document that don't meet the criteria specified in the preamble.	Accept in part
S11.023	Outdoor Bliss Heather Blissett			S11.023	Outdoor Bliss Heather Blissett	General comments - overall	Support in part	Can we remove all the words information, promote, support and encourage to an action. We have been doing this for years and now is time for action. Still too passive. My local Council have been ignoring your information, promotion, support and encouragement to date. The document is far too passive.	Use stronger language throughout the document: Replace "information", "promote", "support" and "encourage" with "implement" or "incentivize" (or better word), Replace "consideration" with "essential". Replace "non-regulatory" with "regulatory".	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S16.097	Kāpiti Coast District Council			S16.097	Kāpiti Coast District Council	General comments - overall	Support in part	Objectives : Many objectives are not drafted clearly with regard to what outcome is sought, and some do not appear to be achievable within the scope of a regional policy statement.	Ensure all objectives are specific, state what is to be achieved where and when, clearly relate to (or state) an issue, and can be determined through implementation and monitoring whether the objectives have been met. Delete all objectives that are not achievable within the scope of a regional policy statement (with respect to legal justification, and the effectiveness and efficiency in light of alternative methods outside of the regional policy statement).	Accept in part
S16.0100	Kāpiti Coast District Council			S16.0100	Kāpiti Coast District Council	General comments - overall	Oppose	Inappropriate use of verbs within objectives and policies: There are a number of examples throughout RPS Change 1 that proposes the use of verbs within objectives and policies that do not align with the RMA or relevant higher-level statutory planning documents. Council submits that the use of the correct verb in each instance is of critical importance due to their specific meaning and requirements for implementation that have been determined through case law. Council has not identified all instances of the use of inappropriate verbs, but this submission requests all verbs are reviewed and replaced where appropriate.	All verbs used in objectives and policies are reviewed and replaced with the appropriate verb in accordance with the RMA and relevant higher-level statutory planning documents.	Accept in part
S16.0102	Kāpiti Coast District Council			S16.0102	Kāpiti Coast District Council	General comments - overall	Oppose	Use of 'and/or' throughout RPS Change 1: We note the use of and/or generally means a choice can be made. This is an issue across RPS Change 1 where it appears there is uncertainty as to whether there should be a choice or not. We request all instances of 'and / or' are reviewed	All instances of and/or are reviewed and 'and' or 'or' are specifically used where appropriate.	Accept in part

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								and 'and' or 'or' are specifically used where appropriate.		
S16.0103	Kāpiti Coast District Council			S16.0103	Kāpiti Coast District Council	General comments - overall	Oppose	Plan-wide provisions that are based on the misconception that district plan content, decision making on resource consents or notices of requirement by the Council are not limited by legislation: There are many examples in the plan change where there is a misconception that a district plan can require certain actions or require specific changes in behaviour. There are many free-market factors that district plans cannot regulate, and therefore should be pursued by the regional council via non-regulatory methods. Examples include but are not limited to: <ul style="list-style-type: none"> Emission of greenhouse gases. Transportation mode choice. Restoration and enhancement activities. Nature based solutions 	Delete all district plan requirements where the proposed methods (including the consideration of RPS policies, district plan making, resource consents, and notices of requirement) attempt to regulate free-market activities and behaviours of individuals that are not clearly supported by the RMA or a higher-level statutory planning document.	Accept in part
S16.0104	Kāpiti Coast District Council			S16.0104	Kāpiti Coast District Council	General comments - overall	Oppose	Explanations to objectives and policies: There are many examples where explanations to objectives and policies either contain information that is unnecessary, or content that should be included in the relevant objective or policy itself. Explanations can provide useful context in some situations, but as they have no legal status under the RMA they should be used sparingly and appropriately.	Review and amend explanations to objectives and policies to: a. Delete those that are unnecessary; and b) Delete text that should have been included in the relevant objective or policy	Accept in part
S16.0106	Kāpiti Coast District Council			S16.0106	Kāpiti Coast District Council	General comments - overall	Oppose	Provisions that are not supported by the RMA, statutory planning documents, or an evidence base that supports and justifies the proposed provisions: We have been unable to	Delete all provisions that are not supported by the RMA, statutory planning documents, or a robust evidence base that supports and	Accept in part

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								find an evidence base supporting and justifying a number of provisions in the plan change. The section 32 evaluation does not assist us in understanding the resource management basis or evidence base for many of the proposed provisions - particularly where a regulatory method is proposed.	justifies their inclusion in a regional policy statement.	
S30.0116	Porirua City Council			S30.0116	Porirua City Council	General comments - overall	Not Stated / Neutral	The real value of regional policy statements is to provide policy direction that either does not exist at a national level or exists at a national level but needs to be articulated at a regional level. Council is concerned about the many provisions in Proposed Change 1 that either duplicate or are inconsistent with matters now comprehensively addressed by national direction. In some instances, they duplicate national direction without giving specific guidance in a Wellington Region context.	Greater alignment with National Direction	Accept in part
S30.0116	Porirua City Council	FS25.033	Peka Peka Farm Limited	FS25.033	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part
S30.0116	Porirua City Council	FS25.159	Peka Peka Farm Limited	FS25.159	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part

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S30.0117	Porirua City Council			S30.0117	Porirua City Council	General comments - overall	Not Stated / Neutral	Council has concerns over jurisdictional issues, particularly in relation to the discharge of contaminants to air, land and water; and the management of fresh waterbodies. We consider that various provisions are ultra vires in terms of our respective functions under sections 30 and 31 of the RMA. Further, territorial authorities do not have the capacity or capability to undertake these functions. Many of the provisions as required would require a transfer of powers from regional councils to territorial authorities.	Query in relation to s30 and s31 functions, RMA, 1991	No recommendation
S30.0117	Porirua City Council	FS25.034	Peka Peka Farm Limited	FS25.034	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	No recommendation
S30.0120	Porirua City Council			S30.0120	Porirua City Council	General comments - overall	Not Stated / Neutral	Not stated	In addition to the relief sought as set out in our submission, as outlined above Council considers that the best course of action would be to withdraw much of Proposed Change 1, or otherwise work with councils on a variation to significantly amend most of its contents.	Accept in part
S30.0120	Porirua City Council	FS25.038	Peka Peka Farm Limited	FS25.038	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	Accept in part

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S34.0111	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.0111	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose in part	Council has not: <ul style="list-style-type: none"> • undertaken a complete check of whether detailed relief sought in this submission, could be/are partly or fully addressed by other provisions in RPS PC1 • undertaken a full review of background documents and higher order documents supporting or relating to these provisions • identified all consequential amendments needed in response to relief sought on specific provisions or that might address our concerns 	Seeks any and all other amendments that will address the relief sought.	Accept in part
S34.0113	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.0113	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose in part	Use of negative rather than neutral language in issue statements: Council is concerned the issues are worded in strong negative language in the absence of any evidence, that Council is aware of, to support this negatively framed position, and these set a negative presumption and tone for the proposed cascading provisions.	Council requests the issues are amended to be written in neutral language with a balanced approach to the issue.	Accept in part
S34.0115	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.0115	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Requirements for district plans to include provisions for regional council functions or that extend beyond the ability of regional council to direct: Council has significant concerns that many of the proposed provisions attempt to require city and district councils to carry out some of the functions of regional councils or require Council to address resource management issues in its district plan that are beyond its statutory functions, powers and duties under the RMA. GWRC is not able to legitimately direct these outcomes. Council considers these provisions ultra vires.	Council opposes the provisions and seeks that the RPS is reviewed and amended to more appropriately and accurately reflect the powers, functions and duties of the regional, district and city councils.	Accept in part

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S34.0116	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.0116	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Lack of higher order document or evidentiary support for provisions, and policies which duplicate national direction: Many of the proposed provisions do not appear to be adequately supported within the Section 32 Assessment by robust evidence, including any existing legislation or higher-level strategic planning document such as a national policy statement. This is particularly evident for the proposed climate change and indigenous biodiversity provisions.	Council submits that a full legal and planning review is undertaken to address these inconsistencies and seeks relief to specific provisions as identified in Table 1 below.	Accept in part
S34.0117	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.0117	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Lack of consideration of scale of provisions: The requirements and evidence base to develop the thresholds require significant effort and resourcing, which Council is not in a position to undertake, and in some cases, thresholds may not be an appropriate mechanism to address effects	Council contends that GWRC should further consider the practicalities associated with threshold-based provisions, to determine if this is the most appropriate method to achieve an objective or policy or develop guidance jointly with territorial authorities to support the development of provisions and decision-making process. Council seeks relief to specific provisions as identified in Table 1 below.	Accept in part
S34.0118	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.0118	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Inadequacy of Section 32 Assessment: Council is concerned that the Section 32 assessment is not sufficiently evidenced and does not fully evaluate whether many of the regulatory provisions are practical / can be achieved and are the best method of achieving the outcomes sought.	These provisions should be deleted and considered in a later plan change.	Accept in part
S34.0120	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council			S34.0120	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Council considers that there are fundamental issues with the proposed provisions that require significant revision or deletion to ensure the RPSPC1 is legally robust and practical to implement. Thus, Council seeks that GWRC undertake a	Council also seeks any other consequential amendments to remedy errors and address relief sought.	Accept in part

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								full legal and planning review of the proposed provisions and amend the RPSPC1 to address these concerns, including detailed submission points on individual provisions included in Table 1.		
S30.0123	Porirua City Council			S30.0123	Porirua City Council	General comments - consideration policies	Oppose	Council opposes all "consideration" policies since they often duplicate or conflict with "regulatory" policies, and represent regulatory overreach without sufficient s32 evaluation or other evidence. We consider that they will create unnecessary regulatory costs due to the way they are drafted. They assume a level of knowledge and expertise on a range of matters generally not available to consent authorities, and in some cases represent a transfer of s31 functions to territorial authorities.	Not stated.	No recommendation
S30.0123	Porirua City Council		Peka Peka Farm Limited	FS25.041	Peka Peka Farm Limited		Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow	No recommendation
S30.099	Porirua City Council			S30.099	Porirua City Council	General comments - definitions	Oppose	Clear and concise definitions are critical to assist in interpretation and implementation of the RPS.	Add any further definitions for any terms that are unclear and where a definition would assist in interpretation and implementation, including any relevant terms proposed to be introduced in response to submissions.	Accept in part
S30.099	Porirua City Council	FS25.132	Peka Peka Farm Limited	FS25.132	Peka Peka Farm Limited	General comments - definitions	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary	Allow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								submission or this further submission by Peka Peka Farm Ltd.		
S140.002	Wellington City Council (WCC)			S140.002	Wellington City Council (WCC)	General comments - consideration policies	Support in part	The title of the regulatory policies as 'consideration' policies set out in chapter 4.2 creates confusion for their statutory weighting and should be amended.	Amend the wording of the title of the regulatory policies as outlined in Chapter 4.2 from 'Consideration' to 'Give particular regard'.	Accept in part
S158.001	Kāinga Ora Homes and Communities			S158.001	Kāinga Ora Homes and Communities	General comments - consideration policies	Oppose	Considers that all of the policies in Chapter 4.2 have been worded to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria). Seek that all policies directing matters of consideration for resource consent are deleted from the regional policy statement in full.	That Chapter 4.2 is deleted from the regional policy statement in full. OR In the alternative that this relief is not granted, seek that the policies are reworded to state the intended outcome such that regional and district plans giving effect to the regional policy statement are suitably informed of the desired outcomes to address identified resource management issues.	Accept in part
S158.001	Kāinga Ora Homes and Communities	FS6.013	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	FS6.013	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	General comments - consideration policies	Oppose	We oppose this submission because this chapter gives effect to the National Policy Statement on Urban Development and the National Policy Statement for Freshwater Management. This chapter has important provisions in relation to Te Mana o te Wai, mana whenua/ tangata whenua roles and values and mātauranga Māori.	Disallow	Accept in part
S158.001	Kāinga Ora Homes and Communities	FS3.032	Waka Kotahi NZ Transport Agency (Waka Kotahi)	FS3.032	Waka Kotahi NZ Transport Agency (Waka Kotahi)	General comments - consideration policies	Support in part	WK supports submission in part and also seeks clarification as to the intent and implementation of this policy.	Not stated. Waka Kotahi seeks clarification as to the intent and implementation of this policy.	Accept in part
S158.001	Kāinga Ora Homes and Communities	FS20.031	Ātiawa ki Whakarongotai Charitable Trust	FS20.031	Ātiawa ki Whakarongotai Charitable Trust	General comments - consideration policies	Oppose	Ātiawa strongly oppose the submission point, it would be inappropriate to delete Chapter 4.2, the chapter contains important strategic policy direction to plan users on how te taiao must be managed, in accordance with Te Tiriti o Waitangi,	Disallow	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
								the RMA, national policy and other statutory direction.		
S158.044	Kāinga Ora Homes and Communities			S158.044	Kāinga Ora Homes and Communities	General comments - consideration policies	Not Stated / Neutral	Considers that a number of policies have been worded within the chapter to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria).	Seek that Chapter 4.2 is deleted from the regional policy statement in full, however seeks that Policy UD.3 is retained with amendments and relocated to Chapter 4.1.	Accept in part
S158.044	Kāinga Ora Homes and Communities	FS6.014	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	FS6.014	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	General comments - consideration policies	Oppose	We oppose this submission because this chapter gives effect to the National Policy Statement on Urban Development and the National Policy Statement for Freshwater Management. This chapter has important provisions in relation to Te Mana o te Wai, mana whenua/ tangata whenua roles and values and mātauranga Māori.	Disallow	Accept in part
S165.060	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)			S165.060	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	General comments - consideration policies	Oppose in part	Submission in reference to Chapter Introduction and Table of Contents Chapter 4.2. The introduction (above the table) incorrectly states the weight to be given to the chapter's policies when changing or varying regional and district plans. Those plans must give effect to the RPS, not have particular regard to the RPS' provisions.	This section contains the policies that need to be given particular regard, where relevant, when assessing and deciding on resource consents or notices of requirement. The policies must be given effect to or when changing, or varying district or regional plans. Within this section, policies are presented in numeric order, although the summary table below lists the policy titles by topic headings.	Accept in part

Main Submission Point	Main Submitter (S)	Further Submission Point	Further Submitter (FS)	Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Accept/Reject
S165.060	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	FS30.319	Beef + Lamb New Zealand Ltd	FS30.319	Beef + Lamb New Zealand Ltd	General comments - consideration policies	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	Accept in part
S100.029	Meridian Energy Limited			S100.029	Meridian Energy Limited	General comments - overall	Not Stated / Neutral	Tables 1A, 3, 4, 6 (a) and 9. Some amendments may be necessary where changes are made to the titles of policies and methods.	Amend the titles of the policies and methods referred to in Tables 1A, 3, 4, 6(a) and 9 where necessary to reflect any amendments made as a result of the foregoing submission points 1 to 28.	Accept in part