

October 2022

Attention:

Greater Wellington Regional Council

100 Cuba Street,

Te Aro,

Wellington

6011

Thank you for the opportunity to make a submission on the Proposed RPS Change 1 for the Wellington Region. Due to pending local government elections and no Committee dates, this is an officer submission.

Overall, Wellington City Council (WCC) is supportive of the plan change approach to addressing critical issues facing the region, including but not limited to urban growth and development, climate change, risks to the health of our freshwater and indigenous biodiversity, and natural hazards. Alignment of the RPS and WCC's approach to urban growth and protection of the environment is crucial, and this plan change allows us to collectively align resource management planning and implementation.

However, there are several improvements and suggestions from WCC on the drafting of the RPS that WCC would like GWRC to address as outlined in our submission. Officers would be open to discussing any of these matters further either prior to hearings or as part of the formal hearings process next year. WCC is also planning to hold hearings on the Council's Proposed District Plan (PDP) starting late February 2022. This provides further opportunities to better align RPS Plan Change 1 and the PDP policies and provisions.

Yours sincerely



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Submission by Wellington City Council on Proposed Change 1 to the Regional Policy Statement for the Wellington Region

Overall, the main points our feedback on Proposed Change 1 to the RPS relate to include:

- Amendments for clarification purposes and further refinement of provisions;
- Concern regarding proposed timeframes not aligning with national direction;
- Clarification of scope and allocation of responsibilities for implementing provisions; and
- Clarification of provisions to ensure practicality and workability for Territorial Authorities

We request the following decisions in general for all provisions:

- a. Make all necessary consequential amendments to introductions, notes, formatting, tables, and indexes; and
- b. Provide all further or other consequential relief as may be necessary to fully give effect to the relief sought.

Wellington City's Strategic Context

The latest population projections have the City's population growth within a planning range of 50,000 to 80,000 more people over the next 30 years. The current Operative District Plan settings means that the City will continue to have a significant housing shortfall unless planning settings are changed. Like most other parts of the region and the country we are also experiencing significant housing unaffordability issues.

New Central Government direction through the National Policy Statement on Urban Development (NPS-UD), and recently introduced Medium Density Residential Standards (MDRS) has been part of the Government's response to these issues. The PDP gives effect to the NPS-UD and MDRS. We continue to suffer from the effects of Covid19 on construction, and city economic patterns has also led to uncertainty around investment and growth.

Wellington City Council's 30 Year Spatial Plan

One of the ways WCC is responding to these issues is through changes to policy settings and investment in infrastructure. In June 2021 the Council approved *Our City Tomorrow – He Mahere Mokowā mō Pōneke A Spatial Plan for Wellington City 2021*. It sets the strategic direction for the growth of the City and protection of the environment over the next 30 years.

<https://experience.arcgis.com/experience/4da3420b9d7c4cc2a00f548ef5e881a1>

Proposed District Plan (PDP)

The PDP was notified 18 July 2022. It gives effect to *Our City Tomorrow – He Mahere Mokowā mō Pōneke A Spatial Plan for Wellington City 2021*.

The notification of the PDP followed three years of consultation with the community, firstly on the development of the Spatial Plan, and then through the development of the non-statutory Draft District Plan, which was consulted on from November to December 2021.

The PDP seeks to strike the right balance between enabling more intensification, ensuring infrastructure capacity is available to service this development, protecting ecological values, and managing climate change effects and damaging high rainfall events. While the Council has signalled a significant increase in three waters infrastructure investment, private development will be required to actively mitigate onsite flood risks.

Key areas of change in the PDP:

Climate Change Mitigation, Natural Hazards and improving management of water

- All new development in urban zones will be required to be hydraulically neutral. For small scale housing development (1-3 units) this will mean that new houses will need to install on-site rainwater tanks and permeable surfacing.
- For new large-scale development of 4 or more units, and all non-residential activities, developers will need to show no net increase in stormwater runoff as compared to modelled undeveloped runoff from the site.
- New large-scale development of 4 or more units, and all non-residential activities, will need to incorporate water sensitive design methods to contribute to an improvement in water quality.
- These controls are expected to have significant social and economic benefits in terms of reducing the risk of flood damage to private property and public assets, and reducing the likelihood and severity of erosion. It also eases pressure on public stormwater networks and will have tangible benefits for water quality.
- A risk-based approach to managing natural hazards, and the impacts of sea level rise and climate change that balances intensification with adaptation.

Urban intensification and carbon emissions

- A significant amount of upzoning is proposed to enable more housing capacity and housing choice in and around the City centre, suburban centres, and the City's train stations.
- A reduction in the extent of character protection in the inner suburbs is proposed, which will enable more development close to the City centre, and help promote walking, cycling and public transport.
- Greater intensification and more mixed use development is enabled within the existing urban area, which supports the City's goal of becoming carbon neutral by 2050.

Ecological Protection

- New rules are proposed to protect the City's areas of important indigenous biodiversity and significant landscapes through significant natural areas (SNAs) and landscape controls.

We also request the following decisions on specific provisions. For some provisions our requested relief is described in general terms. Where we propose specific wording changes, these are shown with **underline and bolded** for additions and ~~striketrough~~ for deletions.

General

Provision	Position	Reasons	Relief sought
General	Amend	Concerns with adding short timeframes when the reasoning cannot be found in the s32 report. Councils will likely be in the middle of transitioning to a new Resource Management legislative system which may not align with the proposed changes or be feasible to implement so many changes at once.	Remove or update all references to “30 June 2025” in the Regional Policy Statement.
General	Amend	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’.
General	Amend	The ordering and wording of the regulatory policies as set out in chapter 4.3 ignores case law and best practise for a what is considered a well written plan. If a plan already gives effect to a higher-level document or policy, then it should not be necessary to refer back to the high-level document in the decision-making process (resource consent level). Refining the wording of the RPS will provide better clarity and direction to the Local Authorities trying to implement the RPS.	Amend wording to “When considering <u>a plan change, variation or review of a plan or if the policy has not been given effect to in the plan, an application for a resource consent or notice of requirement...</u> ”

Chapter 3 – Resource management issues (etc.)

Provision	Position	Reasons	Relief sought
Amendment to Chapter 3	Amend	Issue 2 focuses on adverse effects on the natural environment, and only references housing and infrastructure	Amend Issue 2 with the underlined text, or similar: “ <u>Increasing need for housing and infrastructure capacity.</u> ”

Provision	Position	Reasons	Relief sought
Introduction – new overarching issue 2		capacity as a negative pressure on the environment. RMA section 59 requires the RPS to look at integrated management of natural and physical resources for the region, not just protecting natural processes. It also ignores the NPS-UD objectives.	<u>The supply of housing and infrastructure capacity in the Wellington Region has been insufficient to meet population growth, household needs, and creation of well-functioning urban environments."</u>
New Objective A (within Chapter 3 Introduction)	Amend	To aid in navigating the RPS, the objective should not be located within a chapter introduction, instead it should be located in a stand alone chapter.	Relocate proposed Objective A out of the chapter introduction and treat consistently with how other objectives in the RPS are presented.

Chapter 3.1A – Climate Change

Provision	Position	Reasons	Relief sought
New Chapter 3.1A Climate Change: Introduction	Amend	The wording of the introduction “seven of the past nine years” will soon be out of date.	Amend the start of the introduction: “ <u>As of 2022</u> , long term weather records...” Or otherwise reword so that it will continue to make sense when read in future years.
New Objective CC.2	Support	Support as proposed.	Retain as notified.
New Objective CC.3	Support	Support as proposed.	Retain as notified.
New Objective CC.4	Support	Support as proposed.	Retain as notified.
New Objective CC.5	Support	Support as proposed.	Retain as notified.
New Objective CC.6	Support	Support as proposed.	Retain as notified.
New Objective CC.7	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
New Objective CC.8	Amend	Support but we seek the deletion of the reference to hapū. It is unclear how this can be achieved through council's strategies of partnership with iwi-based mana whenua organisations, and has the potential for uncertainty about the respective roles of iwi and hapū.	Delete the reference to hapū or replace with iwi authority.

Chapter 3.4 – Fresh water

Provision	Position	Reasons	Relief sought
Iwi expression of Te Mana o te Wai	Support	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.
Replacement Objective 12	Support	Support as proposed.	Retain as notified.

Chapter 3.6 – Indigenous ecosystems

Provision	Position	Reasons	Relief sought
Chapter 3.6 – General	Support	Support as proposed.	Retain as notified.
Amendment to Objective 16	Support	Support as proposed.	Retain as notified.
New Objective 16A	Amend	Wording should be consistent with the Exposure Draft for the proposed National Policy Statement for Indigenous Biodiversity (NPS-IB).	The region's indigenous ecosystems are biodiversity are is maintained, enhanced, and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.

Provision	Position	Reasons	Relief sought
New Objective 16B	Support	Support as proposed.	Retain as notified.
New Objective 16C	Support	Support as proposed.	Retain as notified.

Chapter 3.8 – Natural hazards

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

Chapter 3.9 – Regional form, design and function

Provision	Position	Reasons	Relief sought
Amendment to Chapter 3.9 Introduction	Amend	Confusing introduction with unclear direction.	Clarify and refine introduction.
Replacement of Objective 22	Support	Support as proposed.	Retain as notified.
New Objective 22B	Support	Support as proposed.	Retain as notified.

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

Provision	Position	Reasons	Relief sought
<p>New Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure – district and regional plans</p>	<p>Amend</p>	<p>We support this policy but recommend that the policy can be further strengthened by:</p> <ul style="list-style-type: none"> • a reference to the prioritisation of various modes based on the sustainable transport hierarchy. 	<p>Add: A reference to the prioritisation of various modes based on the sustainable transport hierarchy.</p>
<p>New Policy CC.2: Travel demand management plans – district plans</p>	<p>Amend</p>	<p>At a high level WCC supports provisions which will discourage vehicular generating activities in greenfield areas, and in areas not close to public transport and employment.</p> <p>A major concern is that the lack of specificity will lead to inconsistencies in the approach across the region and create tension between the intended outcome of this policy and the practical implementation carried out by Territorial Authorities.</p> <p>Additionally, when looking at the definition of a ‘travel demand management plan’, the policy will likely result in the consideration of the individual development only, which has the risk of ignoring region-wide pressures.</p>	<p>Delete policy CC.2 and the integrate the Policy into the Regional Land Transport Plan.</p> <p>Or</p> <p>Amend Policy CC.2 to be a consideration policy with clearer direction on the outcomes being sought.</p>

Provision	Position	Reasons	Relief sought
		<p>Policy CC.2 also reads as being more appropriate as a consideration policy, where having a more flexible approach is enabled and can be utilised more effectively by a Territorial Authority.</p>	
<p>New Policy CC.3: Enabling a shift to low and zero-carbon emission transport – district plans</p>	<p>Support</p>	<p>The policy statement should focus on “zero-carbon” emission transport. Given that it is a policy to enable mode shift, the use of low-emission transport is a “given” as part of the transition. There are also more modes of low-emission transport that have not been identified.</p>	<p>Amend Policy to have a focus on “zero-carbon’ emission transport and expand the types of active transport modes.</p>
<p>New Policy CC.4: Climate resilient urban areas – district and regional plans</p>	<p>Amend</p>	<p>At a high level WCC supports the intent of this policy.</p> <p>This policy is not sufficiently clear for policy statement users to understand what is required.</p> <p>Policy direction is unclear as to what the RPS is intending, particularly as resilience in relation to climate change is not defined in the RPS.</p> <p>The Explanation reads as policy direction rather than a requirement to provide additional information and should be included in the main section of the policy.</p>	<p>Amend to clarify and refine policy</p> <p><u>Amend Policy to include a portion of the explanation in the Policy section.</u></p> <p>District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.</p> <p>Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. For the purposes of this policy, climate-resilient urban areas mean urban environments that have the ability to withstand:</p> <ul style="list-style-type: none"> • Increased temperatures and urban heat island • Increased intensity of rainfall and urban flooding

Provision	Position	Reasons	Relief sought
			<ul style="list-style-type: none"> • Droughts and urban water scarcity and security • Increased intensity of wind, cold spells, landslides, fire, and air pollution <p>Explanation</p> <p>The policy is directly associated with Policy CC.14 which provides further direction on actions and initiatives to provide for climate resilient urban areas. It is noted that other policies of this RPS also provide for actions and initiatives to deliver climate resilient urban areas, including Policy FW.3.</p>
<p>New Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change – district and regional plans</p>	<p>Amend</p>	<p>The Policy is not sufficiently clear for policy statement users to understand what is required. It is also unlikely that a district or regional plan would fail to provide for nature-based solutions to be part of development and infrastructure planning and design in the absence of this direction.</p>	<p>Clarify and refine wording of policy.</p>
<p>New Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting –</p>	<p>Support</p>	<p>Support as proposed.</p>	<p>Retain as notified.</p>

Provision	Position	Reasons	Relief sought
district and regional plans			
Amendment to Policy 3: Protecting high natural character in the coastal environment – district and regional plans	Support	Support as proposed.	Retain as notified.
Amendment to Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – district and regional plans	Support	Support as proposed.	Retain as notified.
Amendment to Policy 9: Promoting greenhouse gas emission reduction and uptake of low	Support	Support as proposed, note our comments on proposed new Policy CC.2 that the Regional Land Transport Plan is a useful tool to create a Transport Demand Management Plan for the region or at least guidance for how to create one that will achieve the best outcomes for the region.	Amend Policy 9 as needed.

Provision	Position	Reasons	Relief sought
emission fuels – Regional Land Transport Plan			
Deletion of Policy 10: Promoting travel demand management – district plans and the Regional Land Transport Strategy	Support	Support deletion of this policy.	Retain as notified.
Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation – district plans	Support	Support as proposed.	Retain as notified.
New Policy EIW.1: Promoting affordable high quality active mode and public transport services – Regional Land Transport Plan	Support	Support as proposed.	Retain as notified.
Amendment to Policy 12:	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
Management of water bodies – regional plans			
Deletion of Policy 13: Allocating water – regional plans	Support	Support as proposed.	Retain as notified.
Amendment to Policy 14: Urban development effects on freshwater and the coastal marine area – Regional Plan	Amend	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;
Amendment to Policy 15: Managing the effects of earthworks and vegetation disturbance – district and regional plans	Support	Support as proposed.	Retain as notified.
Amendment to Policy 17: Take and use of water for the health needs	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
of people – regional plans			
Amendment to Policy 18: Protecting and restoring ecological function health of water bodies – regional plans	Support	Support as proposed.	Retain as notified.
New Policy FW.1: Reducing water demand – regional plans	Support	Support as proposed.	Retain as notified.
New 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 non-potable water and the management of end of use water will not be effective. If reducing water demand is the goal, then</p>	Delete Policy FW.2

Provision	Position	Reasons	Relief sought
		<p>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>	
<p>New Policy FW.3: Urban development effects on freshwater and the coastal marine area – district plans</p>	<p>Amend</p>	<p>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:</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 to GWRC for the s15 discharge consent. This would not promote integrated management. • 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. 	<p>Amend Policy FW.3 as following:</p> <p>... (k) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</p> <p>(l) Require riparian buffers for all waterbodies and avoid piping of rivers;</p> <p>(m) 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>(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>

Provision	Position	Reasons	Relief sought
		<ul style="list-style-type: none"> 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>New Policy FW.4: Financial contributions for urban development – district plans</p>	<p>Oppose</p>	<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.</p> <p>There are also a number of issues with this policy as drafted, including the lack of a definition for “fair share”.</p> <p>It will also be difficult to adequately apply financial contributions to permitted activities.</p>	<p>Delete Policy FW.4</p> <p>OR</p> <p>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.</p>
<p>Amendment to Policy 23: Identifying indigenous ecosystems and habitats with</p>	<p>Oppose</p>	<p>Reason set out in ‘general’ section above.</p>	<p>Remove deadline.</p>

Provision	Position	Reasons	Relief sought
significant indigenous biodiversity values – district and regional plans			
Amendment to Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans	Oppose	Reason set out in ‘general’ section above.	Remove deadline.
New Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – district and regional plans	Amend	This policy should be clear in the text that it relates to indigenous biodiversity management.	Amend with this text, or similar: When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan, as it relates to managing indigenous biodiversity for subdivision, use or development, particular regard shall be given to enabling mana whenua / tangata whenua to exercise their role as kaitiaki ...
Amendment to Policy 29: Managing subdivision, use and development	Amend	Support the intent of this policy. As some hazards recur with a frequency of less than 1 in 100 years (such as fault ruptures) it should be clarified that it does not preclude consideration of hazards beyond this time period.	Retain the amendments to Policy 29, but with the following change to clause (b): “use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and

Provision	Position	Reasons	Relief sought
in areas at risk from natural hazards – district and regional plans			climate change impacts over <u>at least</u> a 100 year planning horizon;”
Amendment to Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres – district plans	Amend	<p>Johnsonville and Kilbirnie should be considered ‘other regionally significant centres’ as it helps align with the metropolitan centre zone application approach of the WCC PDP.</p> <p>It recognises that the role in growth, economic contribution, access to transport and range of services of Johnsonville and Kilbirnie is aligned with the regional centres, rather than the local centres they had been grouped with.</p>	<p><u>Amend policy as following:</u></p> <p>Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres – district plans</p> <p>District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of regional central business district in the Wellington city and the:</p> <ol style="list-style-type: none"> 1. the regionally significant central business district of Wellington City; 2. other regionally significant centres: <ul style="list-style-type: none"> (i) Upper Hutt city centre; (ii) Lower Hutt city centre; (iii) Porirua city centre; (iv) Paraparaumu town centre; (v) Masterton town centre; and the <u>(vi) Metropolitan centres of Johnsonville and Kilbirnie.</u> 3. the locally significant (suburban) centres in: <ul style="list-style-type: none"> (i) Petone; (ii) Kilbirnie; and

Provision	Position	Reasons	Relief sought
			<p>(iii) Johnsonville; (iv) Ōtaki; (v) Waikanae; (vi) Featherston; (vii) Greytown (viii) Carterton; and (ix) Martinborough...</p>
Amendment to Policy 31: Identifying and enabling a range of building heights and density – district plans	Support	Support provided that the definitions of ‘high density development’ and ‘medium density residential development’ are amended as outlined below in the definition. With the current definitions the policy is too prescriptive and does not meet the intent of the NPS-UD.	Retain as notified provided the definitions of ‘high density development’ and ‘medium density residential development’ are amended.
Amendment to Policy 32: Identifying and protecting key industrial-based employment locations – district plans	Support.	Support as proposed.	Retain as notified.
Amendment to Policy 33: Supporting well-functioning urban environments and a	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
reduction in transport related greenhouse gas emissions – Regional Land Transport Plan			
New Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land – district plans	Amend	While we support the general intent of this policy it is unclear which situations the policy is intended to apply to. At minimum the policy should set out whether it applies only to Māori freehold land, or whether any general land in Māori ownership is included, and which mana whenua groups should be covered.	Amend Policy UD.1 to clarify which situations the policy applies to.

Chapter 4.2 – Regulatory policies – matters to be considered

Provision	Position	Reasons	Relief sought
New Policy IM.1: Integrated management - ki uta ki tai – consideration	Support	Support as proposed.	Retained as notified.
New Policy IM.2: Equity and inclusiveness – consideration	Amend	While we understand the intent of the policy, it is uncertain how this will be implemented within the current resource management considerations for city and district councils without further clarification.	Clarify and refine intent and wording of Policy IM.2

Provision	Position	Reasons	Relief sought
New Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure – consideration	Oppose	<p>Overall WCC supports the intent of Policy CC.9, however the wording is uncertain and confusing meaning it will be difficult to implement in a consistent and practicable manner.</p> <p>Similarly to Policy CC.2, as it will likely be implemented at a local scale, there is the risk of missing region-wide pressures... and planning for reducing emissions will need to be done at a regional scale to achieve optimal results and reduce cross-boundary pressures.</p>	Delete Policy CC.9
New Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions – consideration	Oppose	<p>Applying this consideration to resource consents and notices of requirement will result in unnecessary bureaucracy. Freight servicing developments already look for transport networks and freight movements that are efficient, because this is critical to their business. Greenhouse gas emission reductions for freight businesses are far more effective through tools such as ETS placing costs on fuel, incentives for alternative fuels, etc.</p> <p>This can be a relevant consideration for plan changes that enable freight activities, for example where to zone a new industrial area. However, this is included in Policy CC.9 above.</p>	Delete Policy CC.10.
New Policy CC.11: Encouraging whole of life carbon emissions assessment – consideration	Amend	The title should be clear that this applies to transport infrastructure, however the policy itself is supported to add rigour to greenhouse gas emission assessments of transport projects and encourage new and more efficient low-carbon technologies.	<p><u>Amend title to read:</u></p> <p>Encouraging whole of life carbon emissions assessment for <u>transport infrastructure</u> – consideration</p>

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		<p>More consideration needs to be made for the implementation of this policy to try and ensure that basing a policy off modelling where numbers could change with technology will not end in a situation similar to Nutrient Management and the use of Overseer.</p>	<p>Clarify and refine policy wording to provide greater certainty of how this policy will be implemented.</p>
<p>New Policy CC.12: Protect, enhance and restore ecosystems that provide naturebased solutions to climate change – consideration</p>	<p>Amend</p>	<p>Intent and requirements of policy is unclear and confusing in terms of how it can be feasibly implemented given the policy has used broad and unclear terms.</p> <p>This includes avoiding doing activities in constructed wetlands and rain gardens as they are included in the definition of nature-based solutions.</p> <p>Additionally, the accompanying definitions do not provide any further clarity for the Policy. This is addressed below.</p>	<p>Clarify and refine policy wording to provide greater certainty of how this policy will be implemented.</p>
<p>New Policy CC.13: Managing agricultural gross greenhouse gas emissions – consideration</p>	<p>Amend</p>	<p>As district plans may have rules that manage other aspects of agricultural land use, this policy should be clear it applies to discharge permits only.</p>	<p>Amend with this text, or similar: When considering an application for a discharge permit resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to: ...</p>
<p>New Policy CC.14: Climate resilient urban environments – consideration</p>	<p>Amend</p>	<p>This "provide for" policy is unclear how it would work with resource consents and notices of requirement, and to a lesser extent plan changes, given many will not be relevant to climate resilience. Also some are covered by other methods, e.g. through the Building Act, through pre-development stormwater</p>	<p>Amend (a) by deleting the targets: maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb scale by 2030, and 30 percent cover by 2050,</p>

Provision	Position	Reasons	Relief sought
		requirements, Wellington Water methods for efficient water use and discharge.	
New Policy CC.14: Climate resilient urban environments – consideration	Amend	Wellington City supports increasing tree canopy cover in our City. Our urban suburbs collectively already have 30.61% tree cover. (https://ir.canterbury.ac.nz/bitstream/handle/10092/102168/FOR_E1265_Tree_Canopy_Wgtn_Report.pdf?sequence=2&isAllowed=y#:~:text=Overall%20tree%20canopy%20cover%20in,ranging%20between%2010%20%E2%80%93%2040%25.) Our Green Network Plan aims to double the number of trees in the Central City. However, a 30% tree canopy cover target is not reasonable for some suburbs. Rongotai suburb is mostly Airport and bulk retail/industrial (currently 1% tree cover), and Pipitea suburb is mostly transport infrastructure (currently 3% tree cover). Wellington City is also relatively unique in the Region for not suffering from a noticeable heat island effect due to its regular wind, topography and coastal location. Targets are best left to district councils to set according to their own situation and methods.	Amend (a) by deleting the targets: maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb scale by 2030, and 30 percent cover by 2050,
Amendment to Policy 39: Recognising the benefits from renewable energy and regionally	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
significant infrastructure – consideration			
Amendment to Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Support as proposed.	Retain as notified.
Amendment to Policy 41: Controlling the effects of earthworks and vegetation disturbance – consideration	Support	Support as proposed.	Retain as notified.
Amendment to Policy 42: Effects on freshwater and the coastal marine area from urban	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
development – consideration			
Amendment to Policy 43: Protecting ecological function of water bodies – consideration	Support	Support the deletion of this policy.	Delete Policy 43 as proposed.
Amendment to Policy 44: Managing water takes and use to give effect to Te Mana o te Wai– consideration	Support	Support as proposed.	Retain as notified.
New Policy FW.5: Water supply planning for climate change and urban development – consideration	Support	Support as proposed.	Retain as notified.
Amendment to Policy 47: Managing effects on indigenous	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
ecosystems and habitats with significant indigenous biodiversity values – consideration			
New Policy IE.2: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – consideration	Support	Support as proposed.	Retain as notified.
Amendment to Policy 51: Minimising the risks and consequences of natural hazards – consideration	Amend	As written, the policy would stop use and development that could actually reduce hazards and risk, for example relocation, protection structures, lot adjustments. It's not just "inappropriate" development affected by this policy anymore. Also, hazard sensitive activities are part of "use and development".	Amend with this text, or similar: (g) avoiding subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme; <u>ensuring that subdivision, use or development in areas with high to extreme natural hazard risk can avoid, or mitigate to a moderate or low level, the natural hazard risk;</u>
Amendment to Policy 52: Minimising adverse effects of hazard	Amend	Support the intent of this policy, but more research is needed before 'room for the river' policy can effectively be implemented in the Wellington region and should be removed until we have more information.	Amended Policy 52: (b) whether non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori

Provision	Position	Reasons	Relief sought
mitigation measures – consideration			options provide a more appropriate or suitably innovative solution;
Amendment to Policy 55: Providing for appropriate urban expansion - consideration	Support	Support as proposed.	Retain as notified.
Amendment to Policy 56: Managing development in rural areas – consideration	Amend	This policy is confusing, in that it gives particular regard to matters that the RPS presumably wants to happen, and matters the RPS presumably doesn't want to happen, without a clear statement about which state it prefers. The policy should be worded to consistently refer to the outcomes the RPS wants.	Amend with this text, or similar: (a) the proposal will result in a loss of retain the productive capability of the rural area, including minimising cumulative impacts that would reduce the potential for food and other primary production and reverse sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals; (b) the proposal will reduce retain or enhance aesthetic and open space values in rural areas between and around settlements; (c) the proposal's location, design or density will minimise demand for non-renewable energy resources; and (d) the proposal is consistent with any Future Development Strategy, or the city or district regional or local strategic growth and/or development framework or strategy that addresses future rural development, should the Future Development Strategy be yet to be released;

Provision	Position	Reasons	Relief sought
			or (e) in the absence of such a framework or strategy, the proposal will not increase pressure for public services and infrastructure beyond existing infrastructure capacity.
Amendment to Policy 57: Integrating land use and transportation – consideration	Amend	Applying this requirement to resource consents will result in unnecessary bureaucracy. This policy is about integrated land use and transport planning, which is best done through a plan change, or where a new notice of requirement is applied overtop. Integration is best achieved through plan provisions, not RPS consideration at individual consent level.	Amend with this text, or similar: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development , require land use and transport planning within the Wellington Region is to be integrated in a way which: ...
Amendment to Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration	Amend	It is unrealistic to stop all urban development until all public transport and multi-modal transport are available to serve it. Public transport, cycleways and other transport infrastructure in existing urban areas will usually be the responsibility of councils. Development should not be stopped while this is being built. For example, some high density developments along the Let's Get Wellington Moving Mass Rapid Transit corridor should be allowed while the MRT is being designed, consented and constructed. Also the policy confuses all "subdivision, use or development" and "new urban development", and the list of transport infrastructure options "low or zero carbon", "multi modal", and "public transport" overlap.	Amend with this text, or similar: When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan, for subdivision, use or development , give particular regard to its layout, location and sequencing so require all new urban development including form, layout, location, and timing is sequenced in a way that: (a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and <u>(b) the development is integrated with planned or constructed transport infrastructure for low or zero carbon modes and public transport.</u> (b) all infrastructure required to serve new development,

Provision	Position	Reasons	Relief sought
			including low or zero carbon, multi-modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring.
New Policy UD.2: Enable Māori cultural and traditional norms – consideration	Support	Support as proposed.	Retain as notified.
New Policy UD.3: Responsive planning to developments that provide for significant development capacity – consideration	Amend	<p>We support this direction to meet the requirements of clause 3.8(3) of the NPS-UD. However, the criteria could be improved and made more consistent with the goals of the NPS-UD and easier to read:</p> <ul style="list-style-type: none"> • To better provide for non-residential development, • To recognise there may be limitations in monitoring and this should not preclude applicants from providing the assessment instead, • To avoid unnecessary assessment which is not necessary to determine if a proposal provides for significant development capacity, • To provide a standard for infrastructure provision that recognises that infrastructure capacity cannot always cleanly be assigned and limited to specific areas, and • To improve clarity. 	<p>Clarify and refine wording of policy; and</p> <p>Amend Policy UD.3 as follows:</p> <p>“Policy UD.3: Responsive planning to developments that provide for significant development capacity – consideration</p> <p>When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:</p> <p>(a) the location, design and layout of the proposal:</p> <p style="padding-left: 40px;">(i) contributes to establishing or maintaining the characteristics and qualities of a well-functioning</p>

Provision	Position	Reasons	Relief sought
			<p>urban environment identified in Policy 55(a)(ii) and Objective 22,</p> <p>(ii) is well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors,</p> <p>(iii) where it provides for housing the proposal will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development, <u>(iii) enables medium or high density housing as part of a Centre(s) and/or Mixed Use zoning, or within walking distance of a Centre(s) and/or Mixed Use zoning.</u></p> <p>(b) the proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage otherwise identified in monitoring for:</p> <p>(i) a variety of housing that meets the <u>a</u> regional, district, or local shortages <u>shortage</u> of housing in relation to the <u>a</u> particular type, size, or format, or</p>

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

Provision	Position	Reasons	Relief sought
			(d) required development infrastructure can be provided effectively and efficiently for the proposal, <u>taking into account that the capacity provided by existing or committed infrastructure may already be needed for</u> and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term.

Chapter 4.3 – Allocation of responsibilities

Provision	Position	Reasons	Relief sought
Amendment to Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	Support	Support as proposed.	Retain as notified.
New Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Amend	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.

Chapter 4.4 – Non-regulatory policies

Provision	Position	Reasons	Relief sought
New Policy CC.16: Improve rural resilience to climate change – non-regulatory	Amend	WCC supports the intent of the Policy but is concerned that if done on a city or district wide scale, the benefits will be limited and not achieve integrated management throughout the region.	Amend so it is led and guided by Greater Wellington Regional Council.
New Policy CC.18: Climate change adaptation strategies, plans and implementation programmes – non-regulatory	Support	Support as proposed.	Retain as notified.
Amendment to Policy 65: Supporting and encouraging efficient use and conservation of resources – non-regulatory	Support	Support as proposed.	Retain as notified.
New Policy FW.7: Water attenuation and retention – non-regulatory	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
New Policy FW.8: Land use adaptation – non-regulatory	Amend	For better consistency and guidance of land use adaption, this should be led by the Regional Council.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.
New Policy IE.3: Maintaining, enhancing, and restoring indigenous ecosystem health – non-regulatory	Support	Support as proposed.	Retain as notified.
New Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity – nonregulatory	Support	Support as proposed.	Retain as notified.
Amendment to Policy 67: Establishing and Maintaining the qualities and characteristics	Support	Support provided that the definitions of ‘high density development’ and ‘medium density residential development’ is amended as outlined below in the definition. With the current definitions the policy is too prescriptive and does not meet the intent of the NPS-UD.	Retain as notified provided the definitions of ‘high density development’ and ‘medium density residential development’ are amended.

Provision	Position	Reasons	Relief sought
of well-functioning urban environments			

Chapter 4.5.1 – Regulatory Methods

Provision	Position	Reasons	Relief sought
Amendment to Method 1: District plan implementation	Amend	Update to reflect other relief sought by WCC.	Any relevant amendments to the list of policies to reflect policies where we seek deletion.
Amendment to Method 3: Wellington Regional Land Transport Plan implementation	Support	Support as proposed.	Retain as notified.
Amendment to Method 4: Resource consents, notices of requirement and when changing, varying or reviewing plans	Amend	Update to reflect other relief sought by WCC.	Any relevant amendments to the list of policies to reflect policies where we seek deletion.

Chapter 4.5.2 – Non-regulatory methods – information and guidance

Provision	Position	Reasons	Relief sought
Method CC.3: Travel demand management plans	Amend	Prior to the implementation of the Travel Demand Management Plan, guidance in collaboration with the City and District Councils should be provided to City and District Councils in order to provide greater clarity of intent and ensure consistency across the region.	Where requested, T the Wellington Regional Council will develop in partnership with TAs assist city and district councils with determining land use thresholds for triggering a Travel Demand Management Plan requirement, as well as guidelines for a Travel Demand Management Plan that city and district councils can provide to developers to assist them with mitigating the travel movements and associated greenhouse gas emissions arising from new subdivision, use and development.
Amendment to Method 14: 4: Information on natural hazard and climate change effects	Support	Support as proposed.	Retain as notified.
Deletion of Method 23: Information about natural features to protect property from natural hazards	Support	Support as proposed.	Retain as notified.
Deletion of Method 25:	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
Information about the provision of walking, cycling and public transport for development			
New Method UD.1: Development manuals and design guides	Support	Support as proposed.	Retain as notified.

Chapter 4.5.3 – Non-regulatory methods – integrating management

Provision	Position	Reasons	Relief sought
New Method IM.1: Integrated management - ki uta ki tai	Support	Support as proposed.	Retain as notified.
New Method IM.2: Protection and interpretation of Mātauranga Māori and Māori data	Support	Support as proposed.	Retain as notified.
New Method FW.2: Joint processing urban development consents	Support	Support as proposed.	Retain as notified.
Amendment to Method 17:	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
Reducing waste and greenhouse gases emissions from waste streams			
Amendment to Method 22: Integrated hazard risk management and climate change adaptation planning	Amend	For integrated management across the region, the integrated hazard risk management and climate change adaptation planning should be led by Regional Council.	Amend Method 22 so that it does not apply to city and district councils.
Deletion of Method 31: Protocols for management of earthworks and air quality between local authorities	Support	Support as proposed.	Retain as notified.
Amendment to Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the	Support	Support as proposed.	Retain as notified.

Provision	Position	Reasons	Relief sought
community in the identification and protection of significant values			
Deletion of Method 33: Identify sustainable energy programmes	Support	Support as proposed.	Retain as notified.
Amendment to Method 34: Prepare a regional water supply strategy	Amend	Water allocation and efficiency is Regional Council responsibility.	Amend Method 34 so that it does not apply to city and district councils.
Deletion of Method 35: Prepare a regional stormwater action plan	Support	Support as proposed.	Retain as notified.
Deletion of Method 40: Sign the New Zealand Urban Design Protocol	Support	Support as proposed.	Retain as notified.
Amendment to Method 46: Develop complex development opportunities	Support	Support as proposed.	Retain as notified.

Chapter 4.5.4 – Non-regulatory methods – identification and investigation

Provision	Position	Reasons	Relief sought
New Method CC.4: Prepare a regional forest spatial plan	Amend	Clarify intention of method, if it is to reduce sediment loading in waterbodies then this should be actioned by Regional Councils.	Amend Method CC.4 so that it does not apply to City and District Councils.
New Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Amend	As City and District Councils are likely to be implementing the Indigenous Biodiversity effects management hierarchy, the inventory should be worked on collaboratively.	Amend to include City and District Councils.
Amendment to Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Support	Support as proposed.	Retain as notified.

Chapter 4.5.5 – Non-regulatory methods – providing support

Provision	Position	Reasons	Relief sought
Amendment to Method 53: Support mana whenua /tangata whenua and community restoration initiatives for indigenous ecosystems	Support	Support as proposed.	Retain as notified.
Amendment to Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Amend	Requiring just the consideration of rates rebates is restrictive and may not necessarily be the best option to assist landowners to maintain, enhance and restore indigenous ecosystems.	Assist landowners to maintain, enhance and/or restore indigenous ecosystems identified by Methods IE.2 and CC.7, including by, but not limited to: (a) assisting with the costs of legally protecting indigenous ecosystems by way of open space covenants with Queen Elizabeth the Second National Trust (QEII); (b) considering opportunities for rates rebates; <u>(b) considering opportunities for an incentive packages;</u> (c) assisting with the costs of controlling pest plants and animals; and (d) supporting landowners to restore significant indigenous ecosystems by fencing and planting
Deletion of Method 56: Assist the community to reduce waste, and use water and energy Efficiently	Support	Support as proposed.	Retain as notified.

Chapter 5 – Monitoring

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

Appendices and Definitions

Provision	Position	Reasons	Relief sought
Definitions			
Climate change adaptation	Amend	Definition is confusing and does not allow for a better understanding of what the RPS is aiming to achieve.	Clarify definition.
Climate change mitigation	Amend	Definition is confusing and does not allow for a better understanding of what the RPS is aiming to achieve.	Amend: Human actions to reduce emissions from entering the atmosphere by sources or enhance the removals by sinks of greenhouse gases. Examples of reducing emissions by sources include walking instead of driving, or replacing a coal boiler with a renewable electric-powered one. Examples of enhancing removals by sinks include growing new trees to absorb carbon, promoting and providing for active transport, and increasing public transport services and affordability.
Ecological Connectivity	Amend	The current definition of “ecological connectivity” is confusing and does not provide a clear meaning for the term. It also ignores the Exposure Draft NPS-IB’s definition of 'connectivity' which should replace the current definition.	Amend: Refers to the degree of connection that provides for the movement of genetic alleles and species and the maintenance of ecosystem processes within and between populations and ecosystems.

			<p>To the definition of connectivity used in the Exposure Draft National Policy Statement for Indigenous Biodiversity:</p> <p><u>“refers to the structural or functional links or connections between habitats and ecosystems that provide for the movement of species and processes among and between the habitats or ecosystems”</u></p>
High Density Development	Amend	The height limits go further than the NPS-UD and proposes unnecessary rigidity.	Means areas used predominately for commercial, residential or mixed-use activities with high concentration and bulk of buildings, such as apartments, and other compatible activities, with a minimum building height of 6 stories.
Hydrological controls	Amend	Definition of ‘Hydrological controls’ does not provide a definition, rather it provides guidance for how hydrological controls should be implemented.	<p>Add a new method using the current proposed definition of hydrological controls;</p> <p>and</p> <p>Add a new definition of hydrological controls.</p>
Medium Density Development	Amend	The height limits go further than the NPS-UD and proposes unnecessary rigidity.	Means areas used predominately for residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible commercial and mixed-use activities, with a minimum building height of 3 stories.
Nature-based solutions		Actions such are planting street trees and water sensitive urban design are not enhancing natural ecosystems as they are often isolated from other areas of biodiversity and	<p>Amend:</p> <p>Actions to protect, enhance, mimic, or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce greenhouse gas emissions and/or</p>

		<p>serve a different function than the 'natural ecosystem' would perform.</p> <p>The definition should not include examples as that should be incorporated into the implementation (method) of the policy.</p>	<p>strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects of climate change.</p>
Travel demand management plan	Amend	<p>Part of the definition reads as policy and should be incorporated into the relevant policy/method or be removed.</p>	<p>Amend: A travel demand management plan sets out interventions and actions to influence travel behaviour, with the aim of minimising travel demand or redistributing demand from traditional car usage to more sustainable transport modes for new subdivision, use and development. A travel demand management plan should include mitigation measures that so that planned subdivision, use and development is designed and implemented to maximise quality of life for people without access to a private vehicle, reducing the demand for vehicle trips and associated externalities like greenhouse gas emissions. For example, a travel demand management plan for a new retail development might promote cycle parking facilities and a delivery service, as an intervention to promote travel with low carbon emissions.</p>
Urban Areas	Amend	<p>To be consistent with the wording and intent of the NPS-UD 2020.</p>	<p>Urban areas (as at February 2009) The region's urban areas (as at February 2009) include residential zones, commercial, mixed use zones, urban, residential, suburban, town centre, commercial, community, business and industrial zones and Future Development Areas identified in the Wellington city, Porirua city, Lower Hutt city,</p>

			Upper Hutt city, Kāpiti coast and Wairarapa combined district plans.
Natural Ecosystem	NA	For greater clarity, add a definition of 'Natural Ecosystem'.	<u>Add:</u> <u>Definition of Natural Ecosystem</u>
Undeveloped state	NA	For greater consistency, add a definition of 'undeveloped state'.	<u>Add:</u> <u>Definition of Undeveloped State</u>
Resilience (in relation to climate change)	NA	For greater consistency, add a definition of 'Resilience (in relation to climate change)'.	<u>Add:</u> <u>Definition of resilience (in relation to climate change)</u>
Low Carbon Emissions Transportation Mode	NA	For greater clarity, add a definition of 'Low Carbon Emissions Transportation Mode'.	<u>Add:</u> <u>Definition of Low Carbon Emissions Transportation Mode</u>
Zero Carbon Emissions Transportation mode	NA	For greater clarity, add a definition of 'Zero Carbon Emissions Transportation mode'.	<u>Add:</u> <u>Definition of Zero Carbon Emissions Transportation mode</u>