

PROPOSED PLAN CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

SUBMISSION TO:

GREATER WELLINGTON REGIONAL COUNCIL
ENVIRONMENTAL POLICY
PO BOX 11646
MANNERS ST
WELLINGTON 6142

ATTENTION: HEARINGS ADMINISTRATOR

SUBMITTER INFORMATION

Ingoa Amber Craig

Iwi RANGITĀNE O WAIRARAPA INC

Wāhi noho

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Waea pūkoro 027 255 5663

WE SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE GREATER WELLINGTON REGIONAL COUNCIL

Amend and retain the Plan Change provisions based on the reasons and relief sought set out below and in Appendix One.

Rangitāne o Wairarapa Inc **wish to be heard** in support of this submission and will **consider presenting a joint case** at any hearing with other parties presenting on similar matters.

Rangitāne o Wairarapa Inc is **not** a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

This submission has been sent to Greater Wellington Regional Council by email to regionalplan@gw.govt.nz

Date: 18 October 2022

Address for service: C/- Rangitāne o Wairarapa Inc

OUR SUBMISSION

INTRODUCTION

Mihimihi

Mai-ararā te maunga o Rangitūmau e tu nei	There hither stands our sacred mountain Rangitūmau
Mai-ararā te awa o Ruamahanga e tere nei	There hither flows our spiritual river Ruamahanga
Mai-ararā whakamaua kia tina	There hither hold firm
Tina-te-pū	Hold firm your origins
Tina-te-aka	Hold firm your lineage
Tina-tamore-i-Hawaiki	Hold firm your ancestral homeland
Kia kotahi ko te kāhui-ariki	As the terrestrial bodies gather together
Kia kotahi ko te kāhui-tipua	As the celestial bodies gather together
Kia kotahi ko ngā uri o Rangitāne e tau nei	So also do the descendants of Rangitāne
Haumi ē, Hui ē, Tāiki ē	Connect, Combine, Together

Vision

As Rangitāne o Wairarapa, our people are descendants of Ranginui and Papatūānuku. When our Ātua mātua were separated by their tamariki, they mourn for each other ever since. This is their gift to us, te Hurihanga Wai. This is the cycle of water as we know today and, in all forms, Wai is a taonga. Led by our people, we as humanity need to return our Wai, our Taiao to tūhauora (good health).

As captured by the mihimihi above, the spiritual connections we have to our rivers such as Ruāmahanga are immeasurable. All life comes from Wai and it is only through water that our life can survive. When our Wai and our taiao is suffering, we as a people will suffer. When you look at our descendants of Rangitāne o Wairarapa and the impacts colonisation has had on our awa and our people, you can clearly see the detrimental effects. Papatūānuku is the embodiment of our taiao (environment). Our moana is her heart, our awa is her veins and our Wai is the blood of Papatūānuku.

The way western society looks at our Wai, there is a mindset that Wai is a resource and requires management. Within Te Ao Māori Wai is a taonga to us and is something we need to awhina, not just for the Wai itself but for us as people and all living things we are intrinsically linked to our waters.

“It goes without saying therefore, that at the absolute minimum for us; all elements are inseparable as without one or the other, we will not function the way that we are supposed to. By way of example, if you were to pollute one of our awa as it has been in the past, you will see a direct impact on our

people due to the role that our awa plays in our world, 'ki te ora te wai, ka ora te whenua, ka ora te tangata' meaning, 'if the water is healthy, the land and the people will be nourished'. Thus if the water is not healthy, then the land and the people will be deprived."

Statement of Evidence of Michael Ian Joseph Kawana on Behalf of Rangitāne Tū-Mai-Rā Trust and Rangitāne o Wairarapa. 2017.

This kōrero is also supported by many of our whakatauki, one example is outlined below:

He puna manawa, he manawa whenua!

He manawa whenua, he manawa ora!

He manawa whenua, he manawa tū!

He manawa whenua, he manawa tangata!

A spring of water from the heart of Papatūānuku

An eternal spring of water, unfailing

An eternal spring supports life

An eternal spring supports longevity

An eternal spring supports eternal well-being

THE SPECIFIC PARTS OF THE PROPOSAL THAT OUR SUBMISSION RELATES TO ARE:

The parts of the plan change, Rangitāne o Wairarapa Inc's support or opposition and any relief sought are contained in detail on the following pages.

Our submission includes the following submission points which relate to the plan change as a whole, together with the submission points on individual provisions in Appendix One.

SUBMISSION POINTS RELATING TO THE WHOLE PROPOSED PLAN CHANGE:

GENERAL

Rangitāne o Wairarapa notes that many of the provisions as notified contain inconsistencies in grammatical tense and structure. In some instances we have

suggested wording to rectify this, but we ask that a comprehensive editorial review of the full plan change is undertaken to resolve these errors and inconsistencies.

GIVING EFFECT TO THE NPS FM

Te Mana o te Wai

We appreciate the opportunity to express how our whānau, hapū and Runanga see Te Mana o te Wai. We drafted and provided a statement to this effect, late in the plan change process.

However, the notified plan change is the first opportunity that Rangitāne o Wairarapa Inc has had to fully comprehend how our statement of Te Mana o te Wai might 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 (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).

We also 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. This 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.

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.

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. 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.

Integrated management of freshwater and land use and development

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. We have a number of concerns with this approach.

- 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.
- 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.
- No definition of 'urban development' has been proposed, leaving this term open to interpretation as to what constitutes 'urban development', and what doesn't.

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.

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)

Introducing a set of freshwater provisions for urban development only, continues to provide compartmentalised solutions and does not address integrated catchments. 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 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.

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.

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.

In summary, 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.

INDIGENOUS BIODIVERSITY

Rangitāne o Wairarapa support the intention of the plan change to include provisions which seek to give effect to the Exposure Draft of the National Policy Statement for Indigenous Biodiversity (NPS IB) now, rather than waiting for this policy statement to be formally gazetted. Rangitāne acknowledge Te Rito o te harakeke, however Te Tiriti o Waitangi should be the guiding document. Te Rito o te harakeke is not strong enough, so the Regional Council should be honouring Te Tiriti o Waitangi Māori rights and responsibilities in indigenous biodiversity.

Te Rito o te harakeke is a whakataukāki from Te Aupouri. Although this was included in the Exposure Draft we have questioned the Crown on whether the hapū and iwi were approached and have given permission to use this concept.

In addition, we are very unhappy about the appropriation of our concepts and terms. You cannot define in legislation what te Rito o te Harakeke means to each rohe, to each hapū and to each whānau. Utilising generic terms is fine, but specific whakataukī and whakataukāki can colonise our mātauranga within this space. It is critical that we utilise whakataukī alongside this potentially legislative whakataukī that are more specific to our region and that means more to our people. As tangata whenua, our whānau and hapū must have a central role in this process, reflecting the unique and inseparable relationship that we have with every living thing in the taiao.

We acknowledge that there hasn't been sufficient time to undertake this mahi in time to meet the notification deadline for this Plan Change, but we request that a commitment is made through this Schedule 1 process, to ensure this is completed and embedded into the RPS as soon as possible, and no later than 2024.

Indigenous Biodiversity is us and we are Indigenous Biodiversity. We whakapapa to all of our 'Indigenous Biodiversity' and therefore we hold a sacred relationship. The distinction in the proposed provisions between the role of mana whenua/tangata whenua and landowners is therefore supported and should be retained as notified.

Rangitāne o Wairarapa acknowledges the inclusion of biodiversity offsetting and environmental compensation provisions. However, we seek amendments to ensure the proposed policies and definitions are consistent with best practice and give full effect to the NPS IB when it becomes operative (on the basis that the NPS is expected to be gazetted before the hearings on the plan change and as it is currently an Exposure Draft, the provisions are unlikely to change). Evidence shows that offsetting is not enough to combat the effects of Climate change. As per the [World Economic Forum](#) and [Parliamentary Commissioner for the Environment](#). Offsetting tends to abdicate responsibility and therefore drives wrong behaviours. Therefore, we support solutions and actions that are whānau, hapū and iwi led to determine Indigenous solutions, behavioural changes and promoting of great solutions to be investigated.

CLIMATE CHANGE

Climate change comes from a root of colonisation and capitalism. It will impact people and environments differently. Tangata whenua are among the population groups most at risk of the impacts of climate change, which will result in further inequity unless sufficient resources are allocated to enable us to enact our responsibilities as kaitiaki, plan and respond in a way that aligns with our culture, traditions, and unique relationship with the environment. Many sites of significance, marae, wāhi tapu and urupā for example, will be subject to the impacts of both short- and long-term natural hazard trends. Some of our communities have little or no resources to participate in these decision-making processes, nor sufficient reserves to appropriately prepare for the impacts that these issues pose. Our indigenous biodiversity, mahinga kai and taonga species are more vulnerable to environmental change such as increased temperatures and extreme rainfall. Climate change effects will greatly impact indigenous ecosystems and the ability for nature-based solutions to thrive and support communities. Therefore, we support the acknowledgement in the Plan Change that climate change will exacerbate existing inequities and threaten the tangible and spiritual components of Māori well-being and seek that these provisions are retained. We support the provisions to partner with tangata whenua to address these matters and seek that the provisions which address these matters are also retained. We seek further clarity around the methods and timeframes to achieve this – which must be bold and ambitious.

Rangitāne o Wairarapa are concerned at the urgency at which greenhouse gas emission reductions must be achieved. We seek that the commitment in the section 32 report and Method CC.5 to review the policy package of provisions in the Plan Change which address climate change and agriculture by 31 December 2024 is upheld, in order to provide for the strongest direction possible to reduce agricultural emissions. 'Hold the

line' is an inadequate response to address the climate emergency. We also remind you that indigenous solutions are key and have proven to be massive contributors to reducing and minimising climate change. We therefore seek that tangata whenua are co-governing, co-managing and co-designing solutions for our future with our communities.

Broadly, we seek the following relief:

- That more specific direction is provided within policies and methods to determine how to protect our taiao (indigenous ecosystems), mātauranga māori and nature-based solutions that contribute to hazard mitigation.
- That terminology is used consistently throughout the RPS when referring to indigenous ecosystems, biodiversity, indigenous biodiversity and ecosystems, based on clear rationale as to why each term is used in the particular circumstances.
- That incentives provided for in the RPS including financial incentives. We want to ensure we tautoko the right behaviours.
- That resources and support is provided to tangata whenua to enable whānau, hapū and iwi to participate in co-governance, co-management and co-designing solutions for responding to climate change in a way that best provides for our Ātua, tīpuna, whānau and wider community.

URBAN DEVELOPMENT

Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga. Acknowledgement of these issues is welcomed. While we generally support the proposed amendments which relate to urban development, we request that further changes are made to strengthen the objectives, policies and methods.

Broadly, we seek the following relief:

- That the characteristics of well-functioning urban environments relating to the provision of a variety of homes include quality (i.e. healthy), as well as affordability and location.
- That policy and methods that provide for the occupation, use, development and ongoing relationship of tangata whenua with their ancestral land
- Environmental research explicitly recognises and provides for Mātauranga Māori.

- An opportunity for tangata whenua to build up with iwi their social, cultural, environmental and economic capacity, using Mātauranga Māori; by implementing a kaupapa Māori-based model or framework for urban development that is outcome focused (such as the Whānau Ora Outcomes Framework). This has potential to improve both tangata whenua and wider community outcomes.
- Policies relating to appropriate urban expansion and development in rural areas are consistent in the issues covered and include a requirement to consider all matters covered in Section 6(e) of the RMA 1991.

Appendix One: Submission Points on specific parts of the Proposed Plan Change 1

The submission points set out below include a description of the relief sought. In the case of each submission point, any relief sought includes any consequential amendments to other provisions of the Proposed Plan Change that are necessary to give effect to that relief.

This submission table is organised by broad topics of particular concern to Rangitāne o Wairarapa, rather than by the order that provisions appear in the notified Plan Change.

TE MANA O TE WAI

Provision	Support/ Oppose	Position	Relief sought
Chapter 3.4 Fresh water			
Introduction	Support in part	<p>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".</p> <p>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</p>	<p>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.</p> <p>Add lack of integrated management of freshwater ecosystems to the list of regionally significant issues.</p>

		<p>generations of observing, learning and listening to our taiao.</p> <p>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.</p>	
Objective 12	Support in part	<p>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.</p> <p>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.</p> <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</p>	<p>Remove the six principles of Te Mana o te Wai from the objective, as it is not necessary to repeat these here.</p> <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.</p> <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</p>

		<p>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> <p>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.</p>	<p>appropriately be incorporated in other parts of the RPS or regional plan.</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> <p>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.</p>
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<p>Policy 12</p>	<p>Oppose in part</p>	<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. 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</p>	<p>Amend the policy:</p> <ul style="list-style-type: none"> - 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. - 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. <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.</p> <p>Rangitāne o Wairarapa seek that the FMUs are identified in the RPS and take into account tangata whenua mātauranga when defining them. The Whitua's are too large to be defined as FMUs.</p>
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		<p>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 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.</p> <p>Clause (e) confuses several steps in the NOF process and this needs to be corrected.</p>	<p>In addition, 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.</p> <p>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.</p>
Policy 14	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, I - l.</p> <p>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,</p>	<p>Amend the policy:</p> <ul style="list-style-type: none"> - to improve the grammatical structure, and provide greater clarity and consistency, including in particular clauses a and b; - to extend clause (d) to refer to environmental flows, not just target attribute states - so that it applies to all use and development, not just 'urban development', in order to efficiently and effectively achieve integrated management. <p>Add a definition of 'urban development'.</p>

		<p>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>	
Policy 15	Support in part	<p>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.</p> <p>It is unclear why the life supporting capacity of soil is a freshwater matter.</p>	<p>Reword the provision to provide greater clarity and improve the grammatical structure of the policy.</p> <p>Provide better clarity in the policy on the relationship of the life-supporting capacity of soil to achieving freshwater outcomes.</p>
Policy 17	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</p>	<p>Amend the policy:</p> <ul style="list-style-type: none"> - so that it only provides for the taking of the volume of water necessary for drinking water and sanitation, as these are the health needs of people. Other uses of a public or community supply fall within the third priority, not the second so the policy should be amended to accurately represent this;

		<p>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 missing from the policy and should be included.</p> <p>The taking of water for marae as a health need is supported.</p>	<ul style="list-style-type: none"> - to clarify that the list of "health needs of people" is an exclusive list, not an inclusive one; - to 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 'clean'. <p>Retain the taking of water for marae as a health need.</p>
Policy 18	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	<p>Amend the policy to:</p> <ul style="list-style-type: none"> - improve the clarity and better link the subclauses to the main clause of the policy,

	<p>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.</p> <p>'Promotion' of various actions will not go far enough to achieve the necessary environmental outcomes.</p> <p>Rangitāne o Wairarapa consider that a level of protection will also be needed.</p> <p>'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.</p> <p>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</p>	<ul style="list-style-type: none"> - 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; - 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; - include provision for managing water takes, not just measuring and evaluating them, to ensure that environmental flows and levels are achieved. <p>Amend the explanatory text to:</p> <ul style="list-style-type: none"> - 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
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		<p>must be managed. Habitat is just one component of freshwater ecosystem health.</p> <p>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.</p>	<p>activities and also risks inappropriately elevating some activities or aspects above others.</p>
Policy 40	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>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.</p>	<p>Amend the policy to:</p> <ul style="list-style-type: none"> - 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...."; - minimise effects of the proposal on groundwater recharge areas... in accordance with environmental flows and levels (clause f) - 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); - maintain "or enhance" fish passage (clause k), - 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.

Policy 41	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>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.</p>	<p>Amend the policy to:</p> <ul style="list-style-type: none"> - 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.... "; - maintain current water quality, until environmental outcomes and target attribute states are in place; - reword clause b so that it refers to 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.
Policy 42	Support in part	<p>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.</p>	<p>Amend the policy:</p> <ul style="list-style-type: none"> - 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 <u>all</u> development, not just 'urban development' (which is undefined by the plan change), in order to efficiently and effectively achieve integrated management.

		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.	
Policy 44	Support in part	Rangitāne o Wairarapa support this policy, subject to refinements to improve the grammatical tense.	Amend the policy: <ul style="list-style-type: none"> - so that a consistent grammatical tense is used throughout the policy.
Policy 65	Support in part	Rangitāne o Wairarapa support the conservation and efficient use of water and energy. However, this policy is not strong enough in directing the efficient use of water. Policy 11 of the NPS FM is worded in a directive way so as to 'require' efficient use, it is not sufficient to 'support' or 'encourage' efficient use of water.	Amend the policy and its explanatory text: <ul style="list-style-type: none"> - so that it is consistent with the directive language of Policy 11 of the NPS FM in relation to the efficient use of freshwater.
Policy FW.1	Support in part	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. Other ways to reduce water demand include recycling or reusing water.	Amend the policy to: <ul style="list-style-type: none"> - 'eliminate' leaks, not 'address' them (clause a) - require efficient use of water for <u>all</u> users, not just new developments; - 'require' alternative water supplies, not 'address' them (clause c); - adopt consistent language with other provisions with respect to water users; - correct the grammatical tense in the opening clause ('for' not 'of');

			<ul style="list-style-type: none"> - insert additional policy clauses addressing water recycling, and address these matters; and water conservation, in the explanatory text.
Policy FW.2	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> <ul style="list-style-type: none"> - adopt consistent language with other provisions with respect to water users; - require efficient use of water for <u>all</u> users, not just new developments (clause a); - 'require' alternative water supplies, not 'address' them (clause c); - adopt consistent language with other provisions with respect to water users; - correct the grammatical tense in the opening clause ('for' not 'of').
Policy FW.3	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>Amend the policy:</p> <ul style="list-style-type: none"> - to improve the grammatical structure of clause (k), for example as follows: <u>'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;</u> - to remove the word 'consider' from clauses i and j and use wording that gives effect to the NPS FM; - so that it applies to <u>all</u> development, not just 'urban development' (which is undefined by the

		<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>plan change), in order to efficiently and effectively achieve integrated management.</p>
Policy FW.4	Support in part	<p>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.</p>	<p>Amend the policy title to remove the word 'urban'.</p> <p>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.</p>
Policy FW.6	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</p>	<p>Amend the policy:</p> <ul style="list-style-type: none"> - so that it accurately reflects the regional councils' responsibilities under the NES-F in relation to wetlands; - to explicitly state that district and city councils' control everything else which is not controlled by the regional council.

		<p>and city councils' control everything else which is not controlled by the regional council.</p> <p>It is also not clear whether this policy 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>	
Policy FW.7	Support in part	<p>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 considered nature-based solutions, as built or engineered flood management solutions would not fit within this definition.</p>	<p>Amend the policy:</p> <ul style="list-style-type: none"> - so that it is clearer who this policy is directed at; - to be clearer as to what types of flood management are considered 'nature based solutions'.
Method 32	Support	Rangitāne o Wairarapa support this method.	Retain as notified.
Method 34	Support in part	Rangitāne o Wairarapa support this method.	Reword clause f and g so that they fit grammatically with the opening clause.
Method 48	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	<p>Amend the provision:</p> <ul style="list-style-type: none"> - so that it is grammatically correct and consistent, as currently not all clauses flow appropriately from the introduction.

		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'.	<ul style="list-style-type: none"> - 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.
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.
Method FW.2	Support	Rangitāne o Wairarapa support this method, in particular early engagement with tangata whenua.	Retain as notified.

INDIGENOUS BIODIVERSITY

Provision	Support/ Oppose	Comments	Relief sought
Introduction	Support	<p>Rangitāne o Wairarapa supports the changes to recognise the separate roles of mana whenua/tangata whenua and landowners.</p> <p>However, Rangitāne o Wairarapa wishes to amend the wording in the introduction to more accurately acknowledge the history and issues of our region.</p>	<p>Amend the sentence (“The area of indigenous ecosystems has been in decline since humans first settled in our region”) to highlight that the decline of indigenous biodiversity is a settler impact. The first humans of this land were tangata whenua and we are not settlers.</p>
Te Rito o Te Harekeke	Support in part	<p>The integration of the concept of Te Rito o Te Harekeke through the plan change is supported, however Rangitāne o Wairarapa would like to note that they consider the whakatauki in the Exposure Draft NPS IB is inappropriate for describing this concept in their rohe.</p> <p>Rangitāne o Wairarapa request that a regional and local expression of Te Rito o te Harekeke is developed and codesigned with tangata whenua, and in consultation with the wider community, to give effect to clause 3.2 of the Exposure Draft NPS IB (once</p>	<p>Include a policy, or method, or both, providing for the development of a regional and local expression of Te Rito o Te Harekeke, to be codesigned with tangata whenua and incorporated into the RPS by no later than 2024.</p>

		<p>gazetted). We appreciate that the timing of the Plan Change 1 process has not provided this opportunity, however, we would like to see a process embedded into the RPS that would provide for this to happen.</p> <p>Rangitāne o Wairarapa would like an opportunity to work with Greater Wellington to develop a local expression that demonstrates how Te Rito o Te Harekeke will be given effect to.</p>	
Objective 16	Support	Rangitāne o Wairarapa support this policy and the proposed changes with respect to protection and enhancement of indigenous biodiversity.	Retain as notified
Objective 16A	Support	Rangitāne o Wairarapa support giving effect to Te Rito o te Harekeke, noting the above comments which seek the incorporation of a local expression of this concept.	Retain as notified
Objective 16B	Support	Rangitāne o Wairarapa support the acknowledgment of the special relationship of mana whenua/tangata whenua with indigenous ecosystem health and wellbeing in this policy.	Retain as notified

Objective 16C	Support	Rangitāne o Wairarapa support the acknowledgment of the role of landowners, as well as the separation of Objectives 16B and 16C, to ensure that the special relationship that mana whenua/tangata whenua have with indigenous ecosystem health is recognised.	Retain as notified
Policy 23	Support	Rangitāne o Wairarapa support the inclusion of a deadline for completion of indigenous biodiversity identification.	Retain as notified
Policy 24	Oppose in part	<p>The intention of the amendments to Policy 24 is supported, including the addition of a timeframe. However, Rangitāne o Wairarapa considers that amendments are required to ensure that the policy achieves its intent and provides clear outcomes.</p> <p>The use of the term 'enable' is inappropriate in this context. Biodiversity Offsetting and Biodiversity Compensation are measures to be considered once all other management measures have been explored and discounted. The wording should accurately reflect the role of offsetting and compensation.</p> <p>The wording of the policy does not accurately reflect the intention of the Exposure Draft of the NPS IB,</p>	<p>Amend the policy to:</p> <ul style="list-style-type: none"> - Accurately reflect the role of offsetting and compensation as provided for by the Exposure Draft of the NPS IB; - be consistent with and give effect to the NPS IB (on the presumption this is expected to be gazetted before the plan change hearings commence, and on the basis the wording of the NPS is unlikely to change), particularly with respect to the limits to offsetting and compensation, - amend clause c so that it makes grammatical sense,

		<p>particularly with regard to the limits to offsetting and compensation. It is not helpful to paraphrase the Exposure Draft NPS IB policy where no additional local context is provided.</p> <p>Clause (c) in particular, does not make grammatical sense and it is therefore difficult to understand how it will achieve the intended outcomes.</p> <p>The inclusion of known ecosystems and species that meet the limiting criteria in Appendix 1A is supported for clarity, acknowledging that this list is not necessarily limiting and additional ecosystems or species may be included.</p> <p>The intention of requiring a 10% net gain for offsetting and 10% net benefit for compensation is supported. However, this intention needs to align with the proposed definitions.</p> <p>There are additional principles to offsetting and compensation provided in the NPS IB, the offsetting principles are particularly important. A reference to</p>	<ul style="list-style-type: none"> - ensure the policy wording and proposed definitions adopt a consistent approach with respect to the 10% net gain for offsetting and 10% net benefit for compensation.
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		these principles and the NPS IB in the supporting text would be helpful in highlighting this.	
Policy 47	Support	Rangitāne o Wairarapa support acknowledgement of the limits to offsetting, noting Rangitāne o Wairarapa's outstanding concerns with Policy 24.	Retain as notified
Policy IE.1	Support in part	This policy is supported, specifically the acknowledgement of the requirement to partner with mana whenua/tangata whenua. The explanation of this policy should also acknowledge partnership with tangata whenua.	Retain policy as notified but amend the explanation as follows: Explanation <u>Policy IE.1 directs regional and district plans to partner with mana whenua/tangata whenua to recognise and provide for Māori values for indigenous biodiversity, and for the role of mana whenua as kaitiaki in the region.</u>
Policy IE.2	Support	Rangitāne o Wairarapa support giving effect to mana whenua/tangata whenua roles in managing indigenous biodiversity.	Retain as notified
Policy IE.3	Support in part	Rangitāne o Wairarapa support the intention of this policy, however, further amendments are sought in relation to the following:	Amend the policy to provide for partnering with iwi in the prioritisation of indigenous ecosystems and habitats process.

		<ul style="list-style-type: none"> - the timeframe to ensure identification and prioritisation is completed in a timely manner, rather than 'as soon as practicable'; - the process surrounding prioritisation of ecosystems and habitats in subclause (b) should include partnership with iwi to ensure matauranga and taonga species are included and considered in the prioritisation process. 	<p>Alternatively, include an additional policy that recognises and provides for the role of mana whenua/tangata whenua in the identification of priority ecosystems, habitats and species for management and restoration.</p> <p>Include a timeframe (no later than 2024) in the policy to ensure identification and prioritisation is completed in a timely manner, rather than 'as soon as practicable'.</p>
Policy IE.4	Support in part	Rangitāne o Wairarapa acknowledge the role of landowners in the protection, enhancement and restoration of indigenous biodiversity, however the special relationship tangata whenua have with indigenous biodiversity must also be recognised and acknowledged in the identification and prioritisation process.	<p>Amend policy IE.3 to include partnership with iwi in the prioritisation process and include a reference in the explanatory text to policy IE.4 which explains the special relationship of tangata whenua in this process.</p> <p>Alternatively, include an additional policy that recognises and provides for the role of tangata whenua in the identification of priority ecosystems, habitats and species for management and restoration.</p>
Appendix 1A	Support	Rangitāne o Wairarapa support this appendix, noting the above comments on Policy 24.	Retain as notified

		The inclusion of ecosystem and species names for clarity is supported, acknowledging that this does not preclude additional species or ecosystems being considered.	
Biodiversity offsetting definition	Support in part	Rangitāne o Wairarapa generally support the biodiversity offsetting definition as it is consistent with New Zealand guidance. However, an amendment is required to ensure it aligns with the 10% net gain goal specified in Policy 24 and Appendix 1A.	Amend the definition to be consistent with the 10% net gain goal specified in Policy 24 and Appendix 1A.
Biodiversity compensation definition	Support in part	<p>Rangitāne o Wairarapa support the inclusion of a definition of biodiversity compensation. However, amendments are requested to clarify the purpose and use of biodiversity compensation.</p> <p>The definition must be clear that compensation is the riskiest management approach and comes after all measures to avoid, minimise, remedy or offset have been explored.</p> <p>Compensation is also not necessarily a measurable outcome.</p>	<p>Amend the definition as follows:</p> <p><u>A measurable positive environmental outcome resulting from actions that are designed to compensate for residual adverse biodiversity effects that cannot be otherwise managed</u> <u>avoided, minimised, remediated or offset.</u></p>

Ecological connectivity definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Ecological integrity definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Ecosystem health definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Enhancement definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Maintain/ maintained/ maintenance definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Nature-based solutions definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.

Naturally uncommon ecosystems definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Protect definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Resilience definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Restoration definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Te Rito o te Harekeke definition	Support	The definition of Te Rito o te Harekeke is supported, noting that a process is requested to develop a local expression of Te Rito o Te Harekeke.	Retain as notified.
Threatened ecosystems or species definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.

Tree canopy cover definition	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
Method 21	Support	Rangitāne o Wairarapa supports the amendments to this method.	Retain as notified.
Method 32	Support	Rangitāne o Wairarapa support this method, particularly the partnership directive.	Retain as notified.
Method 53	Support	Rangitāne o Wairarapa supports the amendments to this method.	Retain as notified.
Method IE.2	Support	Rangitāne o Wairarapa support the inclusion of this method and the integration of partnership.	Retain as notified.
Method IE.3	Support	Rangitāne o Wairarapa supports this method.	Retain as notified.
Method IE.4	Support	Rangitāne o Wairarapa supports this method, particularly the partnership directive.	Retain as notified.

CLIMATE CHANGE

Provision	Support/ Oppose	Position/ Comment	Relief sought
3.1A Climate Change (CHP Introduction)	Support	Rangitāne o Wairarapa support the acknowledgement that climate change threatens significant sites for Māori and that climate change will have an unequitable impact on Māori.	Retain as notified.
Objectives CC.1, CC.2, CC.3, CC.4, CC.5, CC.6, CC.7	Support in part	Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it has to be a no-cost solution).	Amend CC.1 so that it includes a clause that reflects the wording of s5 RMA in terms of enabling people and communities to provide for their social, economic and cultural wellbeing,

Objective CC.4	Support	Rangitāne o Wairarapa strongly support Objective CC.4 to ensure that nature-based solutions are an integral part of climate change responses.	Retain as notified.
Objective CC.5	Support in part	Rangitāne o Wairarapa strongly support the objective to increase the area of permanent forest in the Wellington region; but consider that the objective should be targeted at indigenous forest. Increasing the area of permanent indigenous forest will also have benefits for cultural wellbeing, which should be acknowledged.	Amend the objective so that it is focused on indigenous forest and insert a reference to cultural wellbeing.
Objective CC.8	Support in part	Rangitāne o Wairarapa seek to extend the scope of iwi and hapū decision making to include significant cultural sites and taonga species, to increase their resilience to the effects of climate change.	Amend the objective to include significant cultural sites and taonga species.
Policy CC.2 and Method CC.3	Support	Rangitāne o Wairarapa support the requirement to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold. Trigger threshold will need to be carefully considered to ensure the effectiveness of the policy in	Retain as notified.

		reducing GHG emissions and guidelines comprehensive to ensure a wide range of options are considered in travel demand management plans to maximise up-take zero and low carbon transport modes.	
Policy CC.3 and CC.9	Support	Rangitāne o Wairarapa support the enabling of infrastructure that supports the uptake of zero and low carbon multi-modal transport, that contributes to reducing GHG emissions through district plans. Requiring consideration of transport demand optimisation, and maximising transport mode shift away from private vehicles in planning decisions is also supported.	Retain as notified.
Policy CC.5 and Method CC.5	Support in part	<p>In principle, Rangitāne o Wairarapa strongly support any measures to require a reduction in agricultural emissions, rather than simply avoiding increased emissions from this sector.</p> <p>We support the commitment in Method CC.5 but seek this is strengthened to make reference to notifying a plan change, if the review finds that changes to the provisions in the RPS and Regional Plan are required.</p>	<p>Rangitāne o Wairarapa seek that the Regional Council uses any means available to them, including through the RPS if government policy and legislation allows, to require a reduction in agricultural greenhouse gas emissions.</p> <p>Amend Method CC.5 to state that a plan change to the RPS and Regional Plan will be</p>

			notified where changes are required to the provisions.
Policy CC.6	Support in part	Rangitāne o Wairarapa support the promotion and incentivisation of the planting or regeneration of permanent indigenous forest over exotic species. However, we request that 'financial incentives' are included in the explanatory text to highlight the influence such incentives can have in achieving regeneration of permanent indigenous forest.	Include reference to financial incentives in the explanatory text to the policy, as one tool amongst others, that will assist to achieve the "right tree-right place".
Policy CC.7	Support	Rangitāne o Wairarapa support provision for nature-based solutions to climate change.	Retain as notified.
Policy CC.8	Support	Rangitāne o Wairarapa support objectives, policies, rules and/ or methods to prioritise reducing greenhouse gas emissions.	Retain as notified.
Policy CC.10	Support	Rangitāne o Wairarapa support the requirement to consider the proximity of efficient transport networks for freight distribution centres or new development which	Retain as notified.

		will generate significant freight servicing requirements, to optimise freight movement and reduce GHG emissions.	
Policy CC.11	Support	Rangitāne o Wairarapa support the requirement for 'whole of life carbon emissions assessment' to be undertaken for all new or altered transport infrastructure and submitted as part of the application process.	Retain as notified.
Policy CC.12	Support in part	<p>Rangitāne o Wairarapa support the provision for nature-based solutions to climate change, however, the policy as currently worded, does not 'protect' them, as is stated in the explanatory text. We request that this policy includes more direction about how nature-based solutions should be protected, including for example through mechanisms such conditions. It is not sufficient for nature-based solutions to be simply a 'consideration' to which 'particular regard' is made through a resource consent, notice of requirement, change, variation or review of a district or regional plan.</p> <p>Rangitāne o Wairarapa also seek that this policy is cross-referenced with Policy 52 to reflect the priority of soft</p>	<p>Amend the policy to provide stronger protection for nature-based solutions, given the importance of such solutions in the region's climate change response.</p> <p>Provide a cross-reference to Policy 52 in this policy, to reflect the priority that soft engineering solutions should be given over hard engineering solutions, in order to provide for and protect nature-based solutions.</p>

		engineering over hard engineering solutions in achieving nature-based solutions.	
Policy CC.13 and Method CC.5	Support	<p>Rangitāne o Wairarapa support the prioritisation in this policy that gross greenhouse gas emissions from agricultural land use are reduced as the first priority. However, we remain concerned that 'where practicable' weakens the strength of this policy and may not be sufficient to address the reductions needed in this sector.</p> <p>We support the commitment in the s32 Report (i.e. Method CC.5): "The proposed package includes provisions to review the regional policy approach by 31 December 2024 (the date for notification of a full RPS review) to respond to any predicted changes in greenhouse gas emissions from the agricultural sector in the region and any new national direction" (pg 135).</p>	<p>The policy should be amended so that the term 'where practicable' is properly described within the policy and the circumstances in which actions must be regarded as being 'practicable' are stated.</p> <p>As previously stated, Rangitāne o Wairarapa seek that the commitment in the Section 32 Report and in Method CC.5 to review this provision and subsequently to notify a plan change if necessary, by 31 December 2024, is upheld.</p>
Policy CC.14	Support	Rangitāne o Wairarapa support providing for actions and initiatives, particularly nature-based solutions to protect, enhance, or restore natural ecosystems.	Retain as notified.

Policy CC.15	Support	Rangitāne o Wairarapa strongly support the inclusion of nature-based solutions in the promotion and support for land management practices and / or land uses that improve climate change resilience. Provision of information on climate change data and projections to rural communities, and promotion and support for land management and use practices that reduce GHG emissions is also supported.	Retain as notified.
Policy CC.16	Support in part	Rangitāne o Wairarapa support in part the wording to partner with mana whenua in the decision-making process. However, we request that sub-clause (e) requires a range of tools and methods that 'give effect' to Te Mana o te Wai and Te Rito o te Harekeke, in order to be consistent with the relevant national policy statements. It is not sufficient to 'consider' these concepts.	Amend the policy to include wording that will 'give effect' to Te Mana o te Wai and Te Rito o te Harakeke, as required by the relevant national policy statements.
Policy CC.17	Support	Rangitāne o Wairarapa support wording to assist tangata whenua in the development of iwi-led climate change adaptation plans.	Retain as notified.

Policy CC.18	Support in part	Rangitāne o Wairarapa strongly support the promotion and support for planting and natural regeneration of forests to realise the benefits identified in the policy, particularly indigenous biodiversity, erosion control, protecting aquatic ecosystems and increasing social and economic well-being. However, Rangitāne o Wairarapa request that cultural well-being is included as one of the benefits which is subsequently maximised. Prioritising promotion and incentives for planting and regenerating permanent indigenous forest in preference to exotic species is also strongly supported.	Amend policy to read: “Promote and support the planting and natural regeneration of forest to maximise the benefits for carbon sequestration, indigenous biodiversity, erosion control, freshwater and coastal ecosystems, and the social, <u>cultural</u> , and economic well-being of local communities.”
Policy EIW.1	Support	Rangitāne o Wairarapa strongly support the promotion of equitable public transport and active modes which are connected, accessible, affordable, supported by extensive multi modal infrastructure and services.	Retain as notified.
Policy 2 and Method 2	Support in part	Rangitāne o Wairarapa strongly support providing policies, rules and methods to protect tangata whenua and communities from adverse health and amenity impacts from the discharges identified, as well as the phase-out of coal as a fuel source domestically and commercially. Rangitāne o Wairarapa support providing	Amend policy to support reductions in industrial GHG emissions that are consistent with national GHG emissions targets.

		<p>policies, rules and methods to support industry to reduce greenhouse gas emissions; however, clause (c) should be strengthened to include reference to supporting industry reductions that are consistent with national targets set to achieve the objectives of the Zero Carbon Act.</p>	
<p>Policy 7 and Policy 39</p>	<p>Support</p>	<p>Rangitāne o Wairarapa support the recognition of cultural benefits alongside social, economic and environmental deriving from regionally significant infrastructure and renewable energy resources, where access to and use of the infrastructure and renewable energy sources, and therefore the benefits generated, are equitable and achieve, social, economic, cultural and environmental well-being. Consideration of benefits, protection and location of these resources in decision-making is also supported.</p>	<p>Retain as notified.</p>
<p>Policy 9 & Policy 33</p>	<p>Support</p>	<p>Rangitāne o Wairarapa strongly support objectives and policies that promote reducing non-renewable fuel consumption, and transport-related GHG and pollutant emissions, and uptake of low emissions or zero-carbon fuel.</p>	<p>Retain as notified.</p>

Policy 11	Support	Rangitāne o Wairarapa strongly support the promotion of energy efficient design and alterations (particularly in provision of affordable housing), and installation of community scale renewable energy schemes.	Retain as notified.
Policy 29 and Policy 51	Support	Rangitāne o Wairarapa support the 100-year planning horizon and risk-based approach proposed for the management of land development in areas at risk from natural hazards. Adopting this approach and using risk-based assessments as considerations in the decision-making process is also supported. We have whānau, hapū that are on the coastline that will be susceptible to hazards and will need management. There will need to be a tikanga and te ao Māori approach for how this happens as there are relationships to be established (Hapū moving into other Hapū whenua) as well as processes for relocating kōiwi (bones) or taonga.	Amend the policy to: <ul style="list-style-type: none"> • Co-decide and engage with Tangata Whenua for these plans and support. • Incorporate Mātauranga into the analysis.
Policy 52	Support in part	Rangitāne o Wairarapa support Policy 52 in part, where it seeks to determine whether soft engineering is more appropriate and to avoid hard engineering methods unless it is necessary. However, we consider that the words 'suitably innovative' could be subjective and	Amend the policy to: <ul style="list-style-type: none"> - delete the text 'or suitably innovative solution';

		<p>therefore problematic to assess when considering this policy.</p> <p>Rangitāne o Wairarapa support reference in sub-clause (f) to give particular regard to sites of significance to mana/tangata whenua. However, we are concerned that as currently worded, this clause is inappropriately restricted only to those sites 'identified in a planning document'. Many sites will not be documented or identified until the resource consent or notice of requirement stage, and such sites should not be excluded from consideration through those processes.</p> <p>In addition, we request the inclusion of 'taonga species' in sub-clause (e), to be consistent with and give effect to the NPS IB.</p>	<ul style="list-style-type: none"> - include reference to 'taonga species' in sub-clause (e); - to make clause (f) inclusive of other sites of significance which may not be 'identified in a planning document'; - use terminology consistent with the NPS IB, i.e. 'indigenous biodiversity', rather than "local indigenous ecosystem and biodiversity".
Policy 57	Support	<p>Rangitāne o Wairarapa support the list of matters that are required to be given particular regard when considering proposed development that may affect land transport outcomes. However, Clause (e) should be amended to ensure that public transport provision is sequenced such that the 'period of time where public</p>	<p>Amend Clause (e) to reflect a requirement to minimise any period where servicing of subdivision or development by public transport is likely to be inefficient or impractical, as far as practicable.</p>

		transport is not efficient and / or practical' is minimised to the extent possible.	
Method 17	Support in part	<p>Food and soil sovereignty are key priorities for our people. Landfills have traditionally converted our whenua from fertile land to contaminated land and therefore we support methods to minimise unnecessary disposal to landfills.</p> <p>Rangitāne o Wairarapa support the provision for the waste management sector to work in partnership with mana whenua / tangata whenua, local authorities, industry and the wider community to address organic waste generation, collection and diversion from landfill and energy recovery from landfills. While nature-based solutions maybe implicit with organic waste (i.e. composting, anaerobic/aerobic digestion), we consider this preference for nature-based solutions should be explicitly expressed. It should also be made explicit that households should be encouraged to 'reduce at source'</p>	<p>Amend the method to specifically encourage reduction at source through waste minimisation and household composting; and more generally, a preference for nature-based solutions for dealing with collected and diverted (from landfill) organic waste.</p> <p>Add to the method text to support the use of Mātauranga Māori to design, manage and monitor waste reduction and management solutions, particularly where these involve municipal landfills.</p>

		<p>by minimising food waste and composting at home that waste which is unavoidable.</p> <p>We seek that this method is extended to provide for kaupapa Māori approaches to reducing waste to be implemented, along with kaupapa Māori methods for monitoring the success of this method.</p>	
Method IM.1	Support	Rangitāne o Wairarapa support Method IM.1 to partner with and provide support to mana whenua and require Māori data to only be shared in accordance with agreed tikanga and kawa Māori.	Retain as notified
Method CC.1	Support in part	Rangitāne o Wairarapa support the method, but consider that the wording of this method should be stronger, to ensure it is actually achieved.	Amend the method so that the programmes referred to are 'implemented', rather than 'enabled'.
Method CC.2:	Support in part	Rangitāne o Wairarapa are strongly opposed to the use of carbon emissions offsetting to achieve GHG reduction targets, unless it can be clearly demonstrated that all other feasible measures have been taken to reduce GHG emissions. Notwithstanding this, Rangitāne o Wairarapa	Insert a timeframe to this method which is consistent with the other climate change methods in the proposed plan change. The timeframe should be no later than 2024.

		support Method CC.2 to develop carbon emissions offsetting guidance (for situations where no further emission reduction options remain), but request that a timeframe is attached to this method.	
Method CC.4	Support in part	<p>Rangitāne o Wairarapa support Method CC.4 in part, to prepare a regional forest spatial plan using a partnership approach. However, we request that a timeframe of 2024 is specified to have the regional forest spatial plan in place, to be consistent with the timing of the climate extension programme directed in Method CC.8.</p> <p>In addition, the method should include specific provision to monitor the effectiveness and efficiency of implementing the plan.</p>	<p>Amend the method to:</p> <ul style="list-style-type: none"> - specify a timeframe of 2024 to have the regional forest spatial plan in place; - make specific reference to partnering with mana whenua/tangata whenua to prepare the regional forest spatial plan; - include a specific provision to monitor the effectiveness and efficiency of implementing the plans.
Method CC.6	Support in part	Rangitāne o Wairarapa support Method CC.6 in part, to identify nature-based solutions for climate change, however, we request that the method is expanded to include another sub-clause specifying those ecosystems	Amend the method to include a sub-clause identifying ecosystems that provide nature-based solutions to natural hazard mitigation.

		<p>which provide nature-based solutions to natural hazard mitigation.</p> <p>Rangitāne o Wairarapa support provision for the council to partner with mana/tangata whenua to identify ecosystems that should be prioritised for protection, enhancement, and restoration; on the basis of their contribution as a nature-based solution to climate change.</p>	
Method CC.7	Support in part	<p>Rangitāne o Wairarapa support councils to advocate to central Government for new regulatory functions and tools for councils to manage congestion and GHG emissions within major urban areas; however, it is essential that any use of pricing tools and/or taxes is closely considered to ensure fair and equitable distribution of costs and inclusive transition to zero and low carbon transport. It will be crucial to ensure that a range of alternatives (particularly public transport) to private car use are available (through implementation of other policies, e.g., Policies CC.3 and CC.9, and Method CC.10) before financial policy instruments are applied.</p>	<p>Amend the Method to include explanatory notes for the Method that identify the potential for inequitable outcomes of applying financial policy instruments in the absence of policies, and methods that promote, incentivise and provide for transport modal shift.</p>

		The issues around equity of the use of pricing tools or taxes and the need for complementary policies aimed at providing the necessary transport alternatives and encouraging transport mode shifts ahead of the use of pricing tools or taxes should be included in explanatory notes.	
Method CC.8	Support in part	Rangitāne o Wairarapa support Method CC.8 in part, to develop a target extension programme to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change. However, we seek that incentives to support change are developed and included as part of this programme.	Amend the method to include the development of incentives to reduce agricultural submissions and increase rural land use resilience, as part of this programme.
Method CC.9	Oppose in part	Rangitāne o Wairarapa oppose Method CC.9 in part and seek that specific provision is made for mana/ tangata whenua led programmes to be developed where priority indigenous ecosystems have been identified by Methods IE. 2 and CC.6. We also seek that these programmes are 'implemented'. The reference to CC.7 appears to be an error.	Amend the method: - to make specific provision for mana/ tangata whenua led programmes to be developed where priority indigenous ecosystems have been identified by Methods IE. 2 and CC.6; - <u>'to implement programmes that protect, enhance...'</u>

		The word ' <u>indigenous</u> ' should be inserted to ensure the focus is on the appropriate biodiversity values.	<ul style="list-style-type: none"> - To replace text CC.7 with <u>CC.6</u>; - To include the word 'indigenous' before 'biodiversity values'.
Method CC.10	Support	Rangitāne o Wairarapa strongly support developing and promoting a range of incentives to support an equitable and inclusive transition to zero and low carbon transport.	Retain as notified.
Definition (new)			That a definition is included to define what is meant by 'indigenous ecosystems' in the context of the RPS.

URBAN DEVELOPMENT

Provision	Support/Oppose	Comments	Relief sought
Chapter Introduction	Support	<p>Rangitāne o Wairarapa notes that the Introduction appropriately identifies that home ownership and access to affordable housing is exacerbated for Māori (lower ownership rates than national average).</p> <p>The Introduction includes reference to recognising and providing for regionally significant values and features, which includes values of significance to tangata whenua.</p>	Retain as notified.
Regionally Significant Issue A – Lack of housing	Support	Rangitāne o Wairarapa support the specific reference to Papakāinga, within the context of a lack of variety of housing.	Retain as notified.
Regionally Significant Issue B – Inappropriate Development	Support	Rangitāne o Wairarapa support acknowledgement of the adverse impact that inappropriate development has had on the relationship of mana whenua / tangata whenua with their culture, land, water, sites, wāhi tapu and other taonga.	Retain as notified.
Regionally Significant Issue B1 –	Support	Rangitāne o Wairarapa support acknowledgement that poor quality urban design can adversely affect the	Retain as notified.

Poor quality urban design		cultural practices and wellbeing of tangata whenua and communities.	
Objective 22	Support in part	Rangitāne o Wairarapa support the expansion of the clause specifically relating to supporting the ability for Māori to express their cultural and traditional norms to refer to 'providing for tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga'.	Amend subclause (g) of the policy to include "quality" in terms of the variety of homes that are provided for, as follows: <u>(g) Provide for a variety of homes that meet the needs, in terms of quality, type, price, and location, of different households;</u>
Policy 30	Support	Rangitāne o Wairarapa support the amendment of the policy to reflect the NPS-UD terminology.	Retain as notified.
Policy 31	Support	Rangitāne o Wairarapa support expansion and amendment of the policy to reflect the NPS-UD provisions which relate to identifying areas for intensification and providing options for non-tier 1 Councils.	Retain as notified.

Policy 32	Support	Rangitāne o Wairarapa support the strengthening and expanding of the policy to require Council's to identify and protect key industrial-based employment locations.	Retain as notified.
Policy 33	Support	The direction that the Regional Land Transport Plan contain objectives and policies supporting well-functioning urban environments and a reduction in carbon emissions from transport is supported.	Retain as notified.
Policy UD.1	Support in part	Rangitāne o Wairarapa supports the inclusion of this broad overarching policy, in conjunction with a more specific policy containing matters for consideration. The requirement to acknowledge the importance of papakāinga and marae, use of Māori Purpose Zones, and providing for development of Māori owned land is supported. However, we request that an explicit reference to Mātauranga Māori is included in the policy.	Amend subclause (e) of the policy to include specific reference to "Mātauranga Māori": (e) <u>recognising Te Ao Māori and Mātauranga Māori, and enabling mana whenua / tangata whenua to exercise Kaitiakitanga;</u>
Policy UD.2	Support in part	Specific direction to territorial authorities is supported; however Rangitāne o Wairarapa seek that the policy wording is strengthened and a reference included to adopting Kaupapa Māori based models or frameworks that provide an opportunity for tangata whenua to help	Amend the policy as follows: <u>When considering an application for a resource consent, notice of requirement, or a plan change of a district plan for use or development, particular regard shall be</u>

		build iwi social, cultural, environmental and economic capacity, and to express their relationship with their culture, land, water, sites, wāhi tapu and other taonga.	given the ability to enable <i>ling</i> Māori to <u>express their culture and traditions in land use and development, by as a minimum, providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and by providing opportunities for a Kaupapa Māori outcomes-based framework to be applied to future urban development”,</u> or wording that provides similar relief.
Policy UD.3	Support	Rangitāne o Wairarapa support the inclusion of cultural and health facilities in Clause (b)(iii) and assessing a proposal’s contribution to affordable housing in Clause (b)(iv).	Retain as notified.
Policy CC.4	Support	The requirement for policies, rules and / or methods to provide for climate-resilient urban areas and additional direction (through Policy CC.14) is supported.	Retain as notified.

Policy CC.14	Support in part	<p>The requirements to provide for actions and initiatives, particularly nature-based solutions, that contribute to climate-resilient urban areas is supported. Nature-based solutions should be informed by mātauranga Māori.</p> <p>However, Rangitāne o Wairarapa notes that the target and date for restoring tree canopy cover has been weakened from previous draft provisions, from 30% by 2030 to 10% by 2030 and 30% by 2050.</p>	Amend the policy to reference that the use of nature-based solutions should be informed by mātauranga Māori.
Policy 55	Support in part	<p>Recognition and provision for values of significance to tangata whenua is supported; however, subclause (a)(ii)(7) should be expanded to provide for the matters set out in s.6 of RMA.</p> <p>The same issues affect both urban expansion and rural development, therefore this policy and Policy 56 should be amended to be consistent and to address the same matters.</p>	<p>Amend subclause (a)(ii)(7) of the policy to recognise and provide for the matters in Section 6(e) and 6(g) of the RMA, rather than 'values of significance' to tangata whenua.</p> <p>Amend as necessary, together with Policy 56, to ensure consistency between the two policies.</p>
Policy 56	Support in part	<p>Provisions partially amended to reflect suggested amendments (Amend Policy 56, 2 May Hui).</p> <p>Recommended amendment to consider whether the proposal is resilient to climate change and provides for</p>	<p>Amend the policy to:</p> <ul style="list-style-type: none"> - address the issue of loss of production land and reverse sensitivity as two separate matters, rather than as part of the

		<p>adaption in accordance with CC adaptation policies of the RPS has not been included in the amendment.</p> <p>Clause (a) combines issues that should be addressed separately as they relate to quite separate matters (i.e. loss of productive land, reverse sensitivity issues).</p> <p>Rangitāne o Wairarapa notes that the National Policy Statement - Highly Productive Land has now been published. The policy should be reviewed to ensure that it is consistent with and gives effect to this National Policy Statement.</p> <p>Reference to 'aesthetic' values in clause (b) is inappropriately narrow and should be replaced by reference to 'amenity' values, which would cover a broader range of relevant values.</p> <p>The explanatory note for Policy 56 does not appear to relate to the policy and causes confusion.</p>	<p>same clause, as they are not necessarily related;</p> <ul style="list-style-type: none"> - replace reference to 'aesthetic' values with a broader reference to 'amenity' values; - include a requirement for consideration of whether the proposal is climate change resilient and provides for adaptation in accordance with the relevant climate change policies; <p>Review the policy to ensure it is consistent with and gives effect to the National Policy Statement – Highly Productive Land.</p> <p>Amend the explanatory text to better reflect the matters covered by Policy 56 and ensure consistency with the explanation for Policy 55.</p>
Policy 57	Support	Rangitāne o Wairarapa supports the content and intent of this policy.	Retain as notified.

Policy 58	Support	Rangitāne o Wairarapa supports the content and intent of this policy.	Retain as notified.
Policy FW.7	Support	The inclusion of nature-based solutions for attenuation and retention is supported.	Retain as notified.
Policy 67	Support in part	<p>It is noted that this policy covers a range of matters, potentially not all of which non-regulatory – see clause d in particular.</p> <p>The inclusion of subclause (f) relating to partnering with mana whenua / tangata whenua to develop papakāinga design guidelines that are underpinned by Kaupapa Māori is supported. However, the clause only needs to refer to partnering (as this is the same as working together).</p> <p>The amendment of subclause (d) to substitute “encouraging” with “providing for” and the inserted reference to meeting “cultural” needs along with social and economic needs is supported.</p> <p>The explanation provided for Policy 67 does not address the range of matters covered in the policy. The Explanation should be expanded.</p>	<p>Amend clause (f) of the policy to read: <u>“work together and partnering with mana whenua / tangata whenua to prepare papakāinga design guidelines that are underpinned by kaupapa Māori.”</u></p> <p>Provide a more comprehensive explanation of the policy.</p>

Method 1:	Support in part	Implementing the process of amending district plans as soon as practicable is supported. It would helpful if the method included an end date by which this process should have occurred.	Specify an end date by which this process should have occurred.
Method UD.1	Support	The inclusion of provision for dedicated Papakāinga Design Guidance based on Kaupapa Māori and produced in partnership with mana whenua / tangata whenua, and linkage to Policy 67(f) is supported.	Retain as notified
Method UD.2	Support	Rangitāne o Wairarapa notes that the NPS-UD requires development of the FDS to be informed by (<i>inter alia</i>) "Māori, and in particular tangata whenua, values and aspirations for urban development.	Retain as notified
Method 3	Support	The specified timetable for commencing the process to amend the RLTP is supported.	Retain as notified
Method 4	Support	Key policies relating to issues important to mana whenua / tangata whenua are explicitly covered in the method. The requirement to implement the range of policies is supported.	Retain as notified

Method 14	Support in part	<p>Rangitāne o Wairarapa seek that reference to <i>'undertaking research'</i> is more explicit about the potential for the application of Mātauranga Māori (or research tools based on this) to inform natural hazard decision making and understanding.</p>	<p>Amend the method to include reference to Mātauranga Māori based research/monitoring tools:</p> <p><u>'Undertake research (including use of Mātauranga Maori based research/monitoring methods), prepare and disseminate information about natural hazards and climate change effects in order to:'</u></p>
Method CC.8	Support in part	<p>Inclusion of this Method is supported. While the provisions relating to identifying appropriate areas and species for tree planting / natural regeneration in farm plans is supported, the clause should express a preference for native species of vegetation for planting / natural regeneration.</p> <p>Provision (e) identifying other on-farm nature-based solutions that will increase the resilience of a farm system and/or catchment to the effects of climate change is supported.</p>	<p>Amend clause (d) of the method to include a preference for native species of vegetation for planting / natural regeneration in farm plans as part of implementing the regional spatial forest plan.</p>

Method 22	Support	Rangitāne o Wairarapa support the integration of hazard risk management and climate change adaptation across the region.	Retain as notified
Method 46	Support in part	The method refers to joint development of implementation plans and frameworks for each Complex Development Opportunity with central government agencies only. Rangitāne o Wairarapa consider that tangata whenua interests should also be represented as part of this process, as Te Tiriti partners.	Include reference to tangata whenua/mana whenua as being included in the development of any joint framework or implementation plans.

GENERAL

Provision	Support/ Oppose	Position	Relief sought
Chapter 3			
Chapter Introduction	Support in part	Rangitāne o Wairarapa support the inclusion of the overarching resource management issues, in particular Issue 3, which addresses the lack of tangata whenua involvement in decision making. However we consider this issue statement could be	Amend the introductory text as follows: <u>As a result, mana whenua / tangata whenua values and the relationship of Maori and their culture and traditions with their ancestral lands, water, air, sites, waahi tapu and other taonga have not been adequately provided for in resource management, causing disconnection between mana whenua / tangata whenua and the environment.</u>

		stronger and reflect the language is s6(e) of the RMA.	or by alternative wording that provides similar relief.
Objective A	Support in part	<p>Rangitāne o Wairarapa support the objective, particularly the reference to integrated management being guided by Te Ao Māori and incorporating mātauranga Māori. However, we consider tangata whenua relationships with the natural environment should also be included in clause (c) and that the life-supporting capacity of ecosystems should be a separate clause.</p> <p>This objective should be amended to acknowledge that mātauranga Māori will only be incorporated where this is led and undertaken by mana whenua/tangata whenua.</p> <p>How does this overarching objective interact with other objectives in the plan, particularly if there is a conflict in terms of outcomes?</p>	<p>Amend the objective:</p> <ul style="list-style-type: none"> - amend clause (c) of the objective to state <u>protects and enhances mana whenua / tangata whenua values and relationships with the taiao, in particular mahinga kai</u>, or by alternative wording that provides similar relief and that addresses the full range of relevant matters in s6(e) of the RMA; - to separate out the 'life-supporting capacity of ecosystems' so this becomes a separate clause and an additional matter to protect and enhance; - Amend objective to include that mātauranga Māori will be led and undertaken by mana whenua and tangata whenua <p>Clarify the status of the objective in relation to other objectives of the plan and include a policy or some other mechanism to explain how the</p>

			overarching objective should be applied alongside the other objectives of the RPS.
Anticipated environmental results	Support in part	Rangitāne o Wairarapa support this, but consider the wording could be strengthened.	Amend the text as follows: <u>Regional Council and Territorial Authorities collaborate to undertake integrated management of natural resources and recognise and provide for importance of Te Ao Māori and Mātauranga Māori in natural resources management and decision making.</u> or by alternative wording that provides similar relief.
Method IM.2	Support in part	Rangitāne o Wairarapa support the inclusion of this method. This method should be amended to be explicit that mana whenua and tangata whenua will determine how this is implemented.	Amend the method so that it explicit that mana whenua / tangata whenua will define how and when their data will be collected, stored, protected, shared, and managed, and how or when it might be modified or deleted.