

Wellington City Proposed District Plan

**Hearing Stream 6 - ECO, INF-ECO,
APP2, APP3, APP15, SCHED8, SCHED9**

Appendix B

**- Recommended Responses to
Submissions and Further Submissions**

Submitter Name	Sub No / Point No	Sub-part / Chapter /Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Claire Nolan, James Fraser, Bidy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.49	Appendices Subpart / Appendices / APP15 Ecological Assessment	Support	[No specific reason given beyond decision requested - refer back to original submission]	Retain Appendix 15 Ecological Assessment as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.409	Appendices Subpart / Appendices / APP15 Ecological Assessment	Support in part	Generally supports this appendix, however considers it is missing a requirement to clearly identify the potential effects of the proposal, including any cumulative effects. Supports paragraph 2(a) and (b) but notes ECO P1 needs to be amended to explicitly incorporate these concepts. We have sought amendments above to achieve this.	Amend APP15 - Ecological Assessment: <u>2. Identifying the biodiversity values and potential effects of the proposal, including cumulative effects.</u>	Accept	Yes
Director-General of Conservation	385.86	Appendices Subpart / Appendices / APP15 Ecological Assessment	Support	Supports the proposed Ecological Assessment guidelines, which links to the guidance document "Biodiversity Offsetting under the Resource Management Act"	Retain APP15 Ecological Assessment as notified.	Accept in part	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Meridian Energy Limited	228.118	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Amend	Considers clarification of the expression 'trading up' is required.	Clarify the expression 'trading up' in APP3 - Biodiversity Compensation.	Reject	No
Meridian Energy Limited	228.119	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Support in part	The reference to Policy ECO-P2 may be incorrect and the management hierarchy is actually set out in Policy ECO-P1. The policy framework and APP3 should allow consideration of biodiversity compensation where necessary to address residual adverse effects that are more than minor. Some amendments are appropriate to align APP3 to the approach adopted in the Proposed Natural Resources Plan.	Retain APP3-Biodiversity Compensation with amendment.	Reject	No
Meridian Energy Limited	228.120	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Amend	The reference to Policy ECO-P2 may be incorrect and the management hierarchy is actually set out in Policy ECO-P1. The policy framework and APP3 should allow consideration of biodiversity compensation where necessary to address residual adverse effects that are more than minor. Some amendments are appropriate to align APP3 to the approach adopted in the Proposed Natural Resources Plan.	Amend APP3-Biodiversity Compensation as follows (or similar): The following sets out a framework of principles for the use of biodiversity compensation. Principles must be complied with for an action to qualify as biodiversity compensation. 1. Adherence to effects management hierarchy: Biodiversity compensation is a commitment to redress residual adverse effects <u>that are more than minor</u> . It must only be contemplated after the management hierarchy steps in <u>ECO-P1</u> ECO-P2 have been demonstrated to have been sequentially exhausted and thus applies only to residual adverse effects on indigenous biodiversity <u>that are more than minor</u> . 2. Limits to biodiversity compensation: In deciding whether biodiversity compensation is appropriate, a decision-maker must consider the principle that many indigenous biodiversity values are not able to be compensated for because: a. The indigenous biodiversity affected is irreplaceable or vulnerable; b. There are no technically feasible or socially acceptable options or no <u>appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset options</u> by which to secure gains within acceptable timeframes; and ...	Accept	Yes
Claire Nolan, James Fraser, Bidy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.37	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Support	[No specific reason given beyond decision requested - refer back to original submission]	Retain Appendix 3 Biodiversity Compensation as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.403	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Support in part	Opposes the use of compensation as a management approach for indigenous biodiversity. As such, we seek the deletion of this Appendix, and the provisions elsewhere in the Plan providing for compensation.	Delete APP3 (Biodiversity compensation).	Reject	No
Transpower New Zealand Limited	FS29.38	Part 4 / Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Oppose	Transpower supports the recognition of compensation and the provision of schedule APP3.	Disallow	Accept	No

Meridian Energy Limited	FS101.176	Part 4 / Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Oppose	Considers that biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions. Meridian considers the wording amendments proposed by its submission point 228.120, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow / Disallow the requested deletion of APP3. Disallow the requested amendments to APP3.	Accept in part	No
Royal Forest and Bird Protection Society	345.404	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Support in part	However, if compensation is to be retained, we support the mandatory application of principles to its use, and support this appendix, with the exception of the below comments. Pōtai: query why the pōtai is different from the offset appendix.	Amend APP3 (Biodiversity compensation): <u>Pōtai:... These principles will be used when assessing the adequacy of proposals for the design and implementation of offsetting as part of resource consent applications.</u>	Accept	Yes
Meridian Energy Limited	FS101.177	Part 4 / Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Oppose	Considers that biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions. Meridian considers the wording amendments proposed by its submission point 228.120, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow / Disallow the requested deletion of APP3. Disallow the requested amendments to APP3.	Reject	No
Royal Forest and Bird Protection Society	345.405	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Support in part	However, if compensation is to be retained, we support the mandatory application of principles to its use, and support this appendix, with the exception of the below comments. Limits to biodiversity compensation: again, this is a crucial principle, and must be absolutely clear. The drafting of this principle includes a confusing standard of appropriateness, as well as a direction to 'consider the principle'. The 'limits to offsetting' principle is intended to operate as a simple limit, if certain features are present. Incorporating a test of appropriateness defeats the purpose of the principle, which is to set out situations where compensation simply won't be available. It is also not something to simply be 'considered', it is a test that must be met is compensation is allowed. The reason this principle exists is to safeguard against some of the worst outcomes that can be associated with compensation –because compensation is an uncertain management approach, the limits to compensation principle puts a line in the sand, and says that some things are too precious to apply this approach to. It 'bites' as a prior step, before compensation can even be considered. The amended wording below avoids an argument that a value can still be offset, despite its irreplaceable or vulnerable status. In our experience, this is an argument that consent applicants will use when the wording of the 'limits to offsetting' principle is drafted along the lines of the current wording. As such, we seek the following amendments:	Amend APP3 (Biodiversity compensation): <u>2. Limits to biodiversity compensation: In deciding whether biodiversity compensation is appropriate, a decision maker must consider the principle that many indigenous biodiversity values are not able to be compensated for because biodiversity compensation is not available, and the activity causing the residual adverse effects must be avoided where:</u>	Reject	No
Meridian Energy Limited	FS101.178	Part 4 / Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Oppose	Considers that biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions. Meridian considers the wording amendments proposed by its submission point 228.120, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow / Disallow the requested deletion of APP3. Disallow the requested amendments to APP3.	Accept in part	No
Royal Forest and Bird Protection Society	345.406	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Support in part	However, if compensation is to be retained, we support the mandatory application of principles to its use, and support this appendix, with the exception of the below comments. Scale of biodiversity compensation: in general we support this principle, but it needs amendment to ensure it is consistent with Council's obligation to maintain indigenous biodiversity. That obligation requires no net loss of biodiversity, rather than the vague standard of 'proportionality'.	Amend APP3 (Biodiversity compensation): <u>3. Scale of biodiversity compensation: The values to be lost through the activity to which the biodiversity compensation applies must be addressed by positive effects to indigenous biodiversity that are proportionate to the adverse effects on indigenous biodiversity. There must be at least no net loss of indigenous biodiversity values as between the values lost through the activity and the values gained through the biodiversity compensation.</u>	Reject	No

Meridian Energy Limited	FS101.179	Part 4 / Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Oppose	Considers that biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions. Meridian considers the wording amendments proposed by its submission point 228.120, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow / Disallow the requested deletion of APP3. Disallow the requested amendments to APP3.	Accept	No
Royal Forest and Bird Protection Society	345.407	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Support in part	However, if compensation is to be retained, we support the mandatory application of principles to its use, and support this appendix, with the exception of the below comments. Time lags: we seek amendments for the reasons set out in relation to APP2 above. We seek the following amendment:	Amend APP3 (Biodiversity compensation): 7. Time lags: The delay between loss of indigenous biodiversity at the impact site and gain or maturity of indigenous biodiversity at the compensation site must be minimised <u>the shortest necessary to achieve the best possible biodiversity outcome and must not exceed the consent period or 35 years whichever is shorter. so that gains are achieved within the consent period and Any time lag must be identified within the biodiversity offset management plan.</u>	Reject	No
Meridian Energy Limited	FS101.180	Part 4 / Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Oppose	Considers that biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions. Meridian considers the wording amendments proposed by its submission point 228.120, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow / Disallow the requested deletion of APP3. Disallow the requested amendments to APP3.	Accept	No
Royal Forest and Bird Protection Society	345.408	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Support in part	However, if compensation is to be retained, we support the mandatory application of principles to its use, and support this appendix, with the exception of the below comments. Proposing biodiversity compensation: we seek a new principle to replicate principle 11 of APP2.	Amend APP3 (Biodiversity compensation) to add new principle: <u>10. Proposing a biodiversity offset: A proposed biodiversity offset must include a specific biodiversity offset management plan, that:</u> <u>a. Sets out baseline information on the indigenous biodiversity that is potentially impacted by the proposed activity at both the donor and recipient sites, and</u> <u>b. Demonstrates how the requirements set out in this schedule will be carried out, and</u> <u>c. Identifies the monitoring approach that will be used to demonstrate how the principles set out in this schedule will be fulfilled over an appropriate timeframe.</u>	Accept	Yes
Meridian Energy Limited	FS101.181	Part 4 / Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Oppose	Considers that biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions. Meridian considers the wording amendments proposed by its submission point 228.120, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow / Disallow the requested deletion of APP3. Disallow the requested amendments to APP3.	Reject	No
Greater Wellington Regional Council	351.329	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Amend	Considers that amendments are required to principle 3. The positive effects offered should outweigh the adverse effects incurred. This recognises the inherent risks and uncertainty of compensation, thus aiming for an overall net gain from the exchange (though not in the strict technical sense of offsetting as these are like-for-unlike exchanges). This approach would align with that suggested in the definition for biodiversity compensation provided in this plan (see comment above) and with the approach taken in the NRP and in the in the NPS-IB exposure draft	Seeks to amend principle 3 (Scale of biodiversity compensation:) to: 2. Scale of biodiversity compensation: The values to be lost through the activity to which the biodiversity compensation applies must be addressed by positive effects to indigenous biodiversity that are proportionate to <u>outweigh</u> the adverse effects on indigenous biodiversity.	Accept	Yes
Greater Wellington Regional Council	351.330	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Amend	Principle 8 is redundant for managing biodiversity compensation exchanges as it essentially just specifies what the limits of biodiversity compensation are. Compensation exchanges are always like for unlike.	Seeks to delete principle 8 (Trading up).	Reject	No

Greater Wellington Regional Council	351.331	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Amend	Considers that principle 2 should be amended to incorporate direction from principle 8 into the limits of offsetting under the Plan	<p>Amend principle 2 (Limits to biodiversity compensation) to:</p> <p>2. Limits to biodiversity compensation: In deciding whether biodiversity compensation is appropriate, a decision-maker must consider the principle that many indigenous biodiversity values are not able to be compensated for because:</p> <p>a. The indigenous biodiversity affected is irreplaceable or vulnerable;</p> <p><u>ba. The values lost are not indigenous taxa that are listed as Threatened, At-risk or Data deficient in the New Zealand Threat Classification System lists;</u></p> <p>b. There are no technically...".</p>	Reject	No
Director-General of Conservation	385.85	Appendices Subpart / Appendices / APP3 Biodiversity Compensation	Support	Supports the proposed framework of principles for the use of biodiversity compensation, which is in line with the guidance document "Biodiversity Offsetting under the Resource Management Act".	Retain APP3 Biodiversity Compensation as notified.	Accept in part	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Meridian Energy Limited	228.115	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support in part	<p>Considers the Plan includes the defined term 'biodiversity offsetting' so the Appendix should use consistent language. Considers the reference to Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) may be incorrect and the management hierarchy is actually set out in Policy ECO-P1 (Protection of significant natural areas).</p> <p>Considers that the policy framework and APP2 (Biodiversity offsetting) (should apply biodiversity offsetting to residual adverse effects that are more than minor. Some amendments are appropriate to align APP2 to the approach adopted in the Proposed Natural Resources Plan.</p>	Retain APP2 - Biodiversity Offsetting with amendment.	Accept in part	No
Transpower New Zealand Limited	FS29.13	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Oppose	Transpower support the proposed framework of principles for the use of biodiversity offsets, which is in line with the guidance document "Biodiversity Offsetting under the Resource Management Act"	Allow	Accept in part	No
Meridian Energy Limited	228.116	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Amend	<p>Considers the Plan includes the defined term 'biodiversity offsetting' so the Appendix should use consistent language. Considers the reference to Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) may be incorrect and the management hierarchy is actually set out in Policy ECO-P1 (Protection of significant natural areas). The policy framework and APP2 (Biodiversity offsetting) (should apply biodiversity offsetting to residual adverse effects that are more than minor. Some amendments are appropriate to align APP2 to the approach adopted in the Proposed Natural Resources Plan.</p>	<p>Amend APP2 - Biodiversity Offsetting, in the following (or similar) way:</p> <p>The following sets out a framework of principles for the use of biodiversity offsetting. Principles must be complied with for an action to qualify as a biodiversity offset. These principles will be used when assessing the adequacy of proposals for the design and implementation of offsetting as part of resource consent applications.</p> <p>1. Adherence to the effects management hierarchy: The proposed biodiversity offset will be assessed in accordance with the management hierarchy set out in <u>ECO-P1, ECO-P2</u>. It should only be contemplated after the management hierarchy steps in <u>ECO-P1, ECO-P2</u> have been demonstrated to have been sequentially exhausted. Any proposal for a biodiversity offset will demonstrate how it addresses the <u>more than minor</u> residual adverse effects of the activity.</p> <p>2. Limits to offsetting: Many biodiversity values cannot be offset and if they are adversely affected then they will be permanently lost. These situations include where:</p> <p>a. Residual adverse effects cannot be offset because of the irreplaceability or vulnerability of the indigenous biodiversity affected or there is no appropriate offset site;</p> <p>b. There are no technically feasible or socially acceptable options or <u>no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset options</u> by which to secure gains within acceptable timeframes; and</p> <p>c. Effects on indigenous biodiversity are uncertain, unknown or little understood, but potential effects are significantly adverse. ...</p>	Reject	No
Meridian Energy Limited	228.117	Appendices Subpart / Appendices / APP2	Amend	Considers clarification of the expression 'trading up' is required.	Clarify the expression 'trading up' in APP2 - Biodiversity Offsetting.	Reject	No
Claire Nolan, James Fraser, Bidy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.36	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support	[No specific reason given beyond decision requested - refer back to original submission]	Retain Appendix 2 Biodiversity Offsetting as notified.	Accept in part	No

Royal Forest and Bird Protection Society	345.397	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support in part	Supports the provisions of APP2, except as set out below. Support the mandatory requirement that any offset proposal must comply with the principles in APP2	Not specified.	Accept	No
Royal Forest and Bird Protection Society	345.398	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support in part	Limits to offsetting: we generally support this principle. This is a crucial principle, given the risks and uncertainties associated with offsetting. As such, it is very important that this principle is as clear as possible. The wording must avoid any argument that offsetting is available, even where there is irreplaceable or vulnerable biodiversity affected.	Amend APP2 (Biodiversity offsetting): 2. Limits to offsetting: biodiversity offsetting is not available, and the activity causing the residual adverse effects must be avoided where: Many biodiversity values cannot be offset and if they are adversely affected then they will be permanently lost. These situations include where: a. The biodiversity affected by the residual adverse effects is irreplaceable or vulnerable; b. Residual adverse effects cannot be offset because of the irreplaceability or vulnerability of the indigenous biodiversity affected or there is no appropriate offset site; c. There are no technically feasible or socially acceptable options by which to secure gains within acceptable timeframes; and d. Effects on indigenous biodiversity are uncertain, unknown or little understood, but potential effects are significantly adverse.	Reject	No
Meridian Energy Limited	FS101.169	Part 4 / Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Oppose	Meridian considers the wording amendments proposed by its submission point 228.116, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow	Accept in part	No
Royal Forest and Bird Protection Society	345.399	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support in part	Long-term outcomes: we query the last clause of this principle: 'including through the use of adaptive management where necessary'. This is an unusual addition to this principle, and in our view it may increase the uncertainty inherent in offsetting, that an overall ecologically positive outcome will be achieved. As such, we oppose the inclusion of these words.	Amend APP2 (Biodiversity offsetting): 7. Long-term outcomes: The biodiversity offset must be managed to secure outcomes of the activity that last at least as long as the impacts, and preferably in perpetuity, including through the use of adaptive management where necessary.	Reject	No
Meridian Energy Limited	FS101.170	Part 4 / Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Oppose	Meridian considers the wording amendments proposed by its submission point 228.116, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow	Accept in part	No

Royal Forest and Bird Protection Society	345.400	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support in part	Supports in principle, but a requirement to “minimise” delay between loss and gains is unclear and inadequate to ensure good indigenous biodiversity outcomes. There will be a plethora of views about when time lags have been “minimised” or minimised enough. Ecologically, the longer the time lag between the loss and gains the less likely the outcome will be positive or achieve a net gain. In addition, delay increases risk that the offset will not be provided at all. Ideally an offset would be initiated before the loss occurs so that it gets a ‘head start’. Sometimes, however, this may not be feasible, for example if the offset site would be impacted by the activity it is offsetting. The Otago Regional Policy Statement provides one way of overcoming these issues but avoiding the uncertainty of a principle requiring minimisation. It requires that the offset time delay is the least necessary to deliver the best possible biodiversity outcome, or at most the term of the resource consent. This approach has merit but misses that some resource consents will not have a specific term. As such, a final backstop is required.	Amend APP2 (Biodiversity offsetting): 8. Time lags: The delay between loss of indigenous biodiversity at the impact site and gain or maturity of indigenous biodiversity at the offset site must be minimised <u>the shortest necessary to achieve the best possible biodiversity outcome and must not exceed the consent period or 35 years whichever is shorter</u> so that gains are achieved within the consent period and <u>Any time lag must be identified within the biodiversity offset management plan.</u>	Reject	No
Meridian Energy Limited	FS101.171	Part 4 / Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Oppose	Meridian considers the wording amendments proposed by its submission point 228.116, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow	Accept in part	No
Royal Forest and Bird Protection Society	345.401	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support in part	Considers trading up is not appropriate to include in offsetting principles. It is contrary to the requirement that the offset is like for like. It is not an accepted offsetting principle, although may be appropriate for compensation. We seek that this principle is deleted from APP2.	Amend APP2 (Biodiversity offsetting): 9. Trading up: When trading up forms part of an offset, the proposal must demonstrate that the indigenous biodiversity values gained are demonstrably of higher value than those lost, and the values lost are not indigenous taxa that are listed as Threatened, At risk or Data deficient in the New Zealand Threat Classification System lists, or considered vulnerable or irreplaceable.	Reject	No
Meridian Energy Limited	FS101.172	Part 4 / Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Oppose	Meridian considers the wording amendments proposed by its submission point 228.116, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow	Accept in part	No

Royal Forest and Bird Protection Society	345.402	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support in part	Considers this principle needs minor amendments to be clear and effective.	Amend APP2 (Biodiversity offsetting): 11. Proposing a biodiversity offset: A proposed biodiversity offset must include a specific biodiversity offset management plan, that: a. Sets out baseline information on the indigenous biodiversity that is potentially impacted by the proposed activity at both the donor and recipient sites, and b. Demonstrates how the requirements set out in this schedule <u>are met</u> , <u>and how they</u> will be carried out, and c. Identifies the monitoring approach that will be used to demonstrate how the principles set out in this schedule will be fulfilled over an appropriate timeframe <u>in accordance with the principles set out above</u> .	Reject	No
Meridian Energy Limited	FS101.173	Part 4 / Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Oppose	Meridian considers the wording amendments proposed by its submission point 228.116, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.	Disallow	Accept in part	No
Greater Wellington Regional Council	351.326	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support in part	Supports the inclusion of APP2 – Biodiversity Offsetting	Retain provision, subject to amendments, as outlined other submission points.	Accept	No
Greater Wellington Regional Council	351.327	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Amend	Consider it should state the long-term outcome must be at least a 10 percent biodiversity gain or benefit to have regard to Policy 24 in Proposed RPS Change 1.	Seeks to amend to require that that biodiversity offsets shall provide at least a 10 percent net biodiversity gain.	Reject	No
Meridian Energy Limited	FS101.174	Part 4 / Appendices Subpart / Appendices / APP2 Biodiversity	Oppose	Meridian opposes the requested requirement for a +10% net biodiversity gain.	Disallow	Accept	No
Greater Wellington Regional Council	351.328	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Amend	Consider it should state the long-term outcome must be at least a 10 percent biodiversity gain or benefit to have regard to Policy 24 in Proposed RPS Change 1.	Seeks the appendix should set out the limitations where biodiversity offsetting is not appropriate.	Accept	No
Meridian Energy Limited	FS101.175	Part 4 / Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Oppose	Meridian opposes the requested requirement for a +10% net biodiversity gain. The submission does not detail the wording proposed for setting out the limitations on biodiversity offsetting.	Disallow	Reject	No
WCC Environmental Reference Group	377.515	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support	Considers biodiversity offsetting to be a less-than-ideal solution, the reality is that it will be necessary at times, and these principles ensure that environmental damage will be minimised.	Retain APP2 (Biodiversity Offsetting) as notified.	Accept in part	No
Paul Blaschke	FS129.11	Part 4 / Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support	Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".	Allow	Accept in part	No
Director-General of Conservation	385.84	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Support	Supports the proposed framework of principles for the use of biodiversity offsets, which is in line with the guidance document "Biodiversity Offsetting under the Resource Management Act".	Retain APP2 Biodiversity Offsetting as notified.	Accept in part	No
Taranaki Whānui ki te Upoko o te Ika	389.134	Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Not specified	[No specific reason given beyond decision requested - refer to original submission].	Seeks that there is awareness of the impending National Policy Statement for Indigenous Biodiversity. [Inferred decision requested]	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
David Edmonds	1.1	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Considers that the extent of the SNA overlay is incorrect and should be amended. The land covered by the SNA is in fact part of the built environment - the trees cover footpaths, driveways, garages and a cable car landing area. The remaining part of the SNA very small and consists of poor quality scrub and weeds. [Refer to original submission for full reason, including attachment].	Retain as notified with no Significant Natural Area overlay in residential areas.	Accept	No
David Edmonds	1.2	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that the extent of the SNA overlay is incorrect and should be amended. The land covered by the SNA is in fact part of the built environment - the trees cover footpaths, driveways, garages and a cable car landing area. The remaining part of the SNA very small and consists of poor quality scrub and weeds. [Refer to original submission for full reason, including attachment].	Remove Significant Natural Area overlay from the legal road outside 2 & 4 Governor Rd and 6 & 8 The Rigi, Northland (WC092)	Accept	Yes
Aaron Chester	6.1	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Considers that the Northern part SNA on 215 Takapu Road does not meet any of the 5 criteria used to assign SNA's. The area is manmade. The land has high human impact and has never had livestock excluded from it. There is no original or significant native flora in the area. [Refer to original submission for full details of current vegetation]. The SNA will prevent the construction of a planned disabled access to the house for elderly relatives and the intended planting of natives.	Seeks that 215 Takapu Road is retained as notified - with no Significant Natural Area.	Accept	No
Aaron Chester	6.2	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Considers that the Southern part SNA on 215 Takapu Road does not meet any of the 5 criteria used to assign SNA's. The area is manmade. The land has high human impact and has never had livestock excluded from it. There is no original or significant native flora in the area. The SNA will prevent the construction of a planned disabled access to the house for elderly relatives and the intended planting of natives.	Seeks that 215 Takapu Road is retained as notified - with no Significant Natural Area.	Accept	No
Peter Kelly	16.7	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Considers that it will not fragment the SNA area if the area at 170 Parkvale Road is not classified as a SNA. [Refer to original submission for SNA coordinates]. The cleared area is flat and suitable for residential purposes.	Seeks that 170 Parkvale Road is retained as notified - with no Significant Natural Area.	Accept	No
Barry Insull	32.9	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	WC144 (Wellington coastal cliffs scrub and shrubland) makes no mention of the Red Rocks Historic Reserve designation and should be amended.	Seeks that WC144 (South Wellington coastal cliffs scrub and shrubland) have a reference to the site's Historic Reserve designation.	Reject	No
Barry Insull	32.10	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Not specified	Considers that in WC144 (Wellington coastal cliffs scrub and shrubland), Sinclair Head could comprise two reserves depending on what defines the feature. [refer to original submission]	Not Specified.	Reject	No
Barry Insull	32.11	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	The Site Summary in WC144 (Wellington coastal cliffs scrub and shrubland) does not describe the purpose of specialist reserves in the area, namely Pariwhero / Red Rocks and Sinclair Head / Te Rimurapa Scientific Reserves and should be amended.	Seeks that WC144 (South Wellington coastal cliffs scrub and shrubland) have a reference to the purpose of specialist reserves.	Reject	No

Barry Insull	32.12	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	The Site Summary in WC122 does not list bird species similarly to WC144 and should be amended to match WC144.	Seeks that WC122 (Tongue Point coastal platform) make mention of bird species in the area to match WC144 (South Wellington coastal cliffs scrub and shrubland).	Reject	No
Barry Insull	32.13	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	The Site Summary in WC146 does not list bird species similarly to WC144 and should be amended to match WC144.	Seeks that WC146 (Karori Stream estuary) make mention of bird species in the area to match WC144 (South Wellington coastal cliffs scrub and shrubland).	Reject	No
Barry Insull	32.14	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports that credit is being given to the Wellington Cross Country Vehicle Club in WC144 in relation to their conservation input to protect and enhance the covenanted Kinnoull dunes. The club has been active in a number of like activities for many years.	Not specified.	Accept	No
Barry Insull	32.15	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that the Coastal Cliffs East of Karori Stream Estuary does not qualify as a historic habitat for Long Bay Beach Weevil.	Seeks that language in Site Summary of WC144 (South Wellington coastal cliffs scrub and shrubland) be amended to remove mention of "the only known North Island population of speargrass weevil (<i>Lyperobius huttonii</i>)". [Inferred decision requested]	reject	no
Ian Law	101.8	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Opposes any attempts to reinstate Significant Natural Areas on private land.	Retain SCHED8 (Significant Natural Areas) as notified - with no SNA's on private land.	Accept	No
Janice Young	140.8	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Opposes the reinstatement of Significant Natural Areas on private land.	Retain SCHED8 - Significant Natural Areas as notified (with no Significant Natural Areas on private land).	Accept	No
Sarah Packman and Simon Fern	150.1	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the removal of the SNA on 65A Holloway Road, Aro Valley. The submitter would like to have options available in the future to build or garden on this area.	Retain SCHED8 - Significant Natural Areas as notified (with no SNA on 65A Holloway Road).	Accept	No
David Stevens	151.18	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports no SNAs on private residential land as notified. Considers that most SNAs, which rightly need to be protected, are not on private residential land. Reinstating SNAs on private land would impinge on homeowners' rights to enjoy their property as they wish and would be a disincentive to further protection of native flora. Many parts of the proposed SNAs on private land are not significant native bush areas but just happen to show up green in aerial photographs.	Retain SCHED8 - Significant Natural Areas as notified (with no SNAs on private residential land).	Accept	No
David Stevens	151.19	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Opposes reinstatement of SNAs on private residential land. Considers that most SNAs, which rightly need to be protected, are not on private residential land. Reinstating SNAs on private land would impinge on homeowners' rights to enjoy their property as they wish and would be a disincentive to further protection of native flora. Many parts of the proposed SNAs on private land are not significant native bush areas but just happen to show up green in aerial photographs.	Seeks that Significant Natural Areas are not included on residential land.	Accept	No

M&P Makara Family Trust	159.13	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Considers that the area of SNA WC042 should be amended by removing a portion of gully land to the south of the stream running uphill (refer to submission for illustration).</p> <p>The gully in question can not justifiably be included as an SNA, and no ecological study that would suggest it should be has been provided. The gully has been partially fenced in recent years so it can regenerate and it has a pond or wetland area that was created when a residential and farm access road was constructed, but it is not of a standard that would warrant inclusion, largely consisting of manuka, mahoe and pungā, as are many scrub areas in Makara that are not otherwise included as SNA's.</p> <p>The submission does not object to the majority area of land in this SNA being included. The s32 report on the previous submission concerning this location misrepresents the objection as being to the inclusion of all SNA areas on the property.</p>	<p>Amend the area covered by SNA WC042 (Scrub along Makara Stream tributary Quartz Hill No2) by removing a portion of gully land to the south of the stream running uphill.</p> <p>[Refer to submission for illustration of area].</p>	Reject	no
Thomas Brent Layton	164.7	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	<p>Considers that the WCC should abandon the SNA overlay and instead enter into negotiations. This will focus WCC and the community's mind on what value they place on conserving areas.</p> <p>Considers that If the council thinks that there is a net benefit to society from an SNA it should negotiate with the current owners over the imposition of controls and impose the costs of preservation on all ratepayers. If they don't think the community will bear the costs sought by the landowner, then, clearly, the community (which includes the landowner) will be better off if the land is not subject to an SNA.</p> <p>[Refer to original submission for full reasons].</p>	Remove the Significant Natural Area overlays from the Proposed District Plan.	Reject	No
Trelissick Park Group	168.27	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Considers that Heke Reserve (in Ngaio) should be included in SCHED8 - Significant Natural Areas.</p> <p>Considers that the degradation of the streams in the Kaiwharawhara catchment from stormwater and slips like the recent Wilton Park slump, causing downstream silting is a concern. Mitigation following increasingly frequent storm water events needs to be a priority to maintain the stream ecosystem.</p>	Amend SCHED8 - Significant Natural Areas to include Heke Reserve (in Ngaio).	Reject	No
Helen Grove	197.3	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support in part	<p>Supports the removal of SNAs on private property from urban land.</p> <p>[Refer to original submission for full reasons].</p>	<p>Retain SCHED8 - Significant Natural Areas, with respect to not having Significant Natural Areas on private residential land.</p> <p>[Inferred decision requested].</p>	Accept	No
Helen Grove	197.4	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that SNAs should be removed from private rural land.	Amend SCHED8 - Significant Natural Areas, to remove Significant Natural Areas from private rural land.	Reject	No

Boston Real Estate Limited	220.4	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Considers that the planning and Environment Committee deemed that the SNAs will apply to public and rural land. As this land is currently held in private ownership and zoned business and outer residential, the SNA cannot apply to this property.</p> <p>Relatedly considers that the area zoned Natural Open Space should be rezoned as medium density residential zone. As such the SNA should be removed from this part of the property.</p> <p>Considers that the information base for the Councils approach to SNAs is flawed and inaccurate.</p> <p>Considers that the site does not have significant ecological value.</p> <p>[Refer to original submission for full reason]</p>	Remove Significant Natural Area overlay from 62 Kaiwharawhara Road (WC079).	reject	no
Tyers Stream Group	221.81	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	<p>Supports the classification of WC114 (Tyers Stream) as an SNA.</p> <p>Considers that the description of the SNA includes the significance of the Tyers Stream Reserve SNA for both land and instream flora and fauna.</p>	Retain the significant natural area WC114 (Tyers Stream) as notified.	Accept	No
Tyers Stream Group	221.82	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Considers that the neighbouring SNA's protect the increasingly important habitat and biodiversity of the Wellington area.</p> <p>The Reserve and those parts of the SNA on private land adjoining the reserve and stream, form an important part of the ecological corridor from Wellington Harbour to Khandallah Park, and beyond including Huntleigh Park, Otari/Wilton's Bush and Zealandia.</p> <p>The SNAs on private property also provide an ecological buffer and increase the area of continuous vegetation thereby increasing the biological carrying capacity of the area and its biodiversity potential.</p>	Amend SCHED8 - Significant Natural Areas to include significant natural areas on privately owned residentially zoned properties.	Reject	No
Steve West	FS110.2	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	<p>Notes that original submitter states that “SNAs on residential private property adjoining Tyers Stream should be reinstated as they protect increasingly important habitat and biodiversity of the Wellington area. Considers that this would then enable those residents and the community to be supported in efforts to enhance those values.” The original submitter also infers that without SNAs on private urban land, Wellington’s indigenous biodiversity would be worse.</p> <p>Opposes the reinstatement of SNAs on residential private property in the Proposed District Plan (including around Tyers Stream) for the following reasons:</p> <ul style="list-style-type: none"> - Indigenous biodiversity in Wellington has increased significantly over the last 20 years, without any need for SNAs. Rather voluntary conservation efforts have been hugely successful in Wellington City. - Considers that instead of supporting residents, creating SNAs on private urban land in the district plan will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner value and goodwill in the process. There is real risk that indigenous biodiversity gains achieved over the last two decades will diminish over time should SNAs be created on private urban land. 	Disallow	Accept	No
Russell Taylor	224.5	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Opposes SNAs on private land	<p>Only apply SCHED8 - Significant Natural Areas to publicly owned land.</p> <p>[Inferred decision requested]</p>	Accept	No

Karepa Dell Developments	241.4	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Considers that the imposition of a Significant Natural Area over the property at 11 Makomako Road is an unreasonable means of meeting Council's obligation to recognise and provide for significant areas under Section 6 of the RMA. Considers that reliance on the Wildlands report is not justified given the high-level nature of the report, and no on-site audits have occurred to ground truth the classification. Considers there is no evidence to show the listed plant types and birds are located on the site, and as no site-specific assessment has been completed, then the status quo (i.e. no SNA) should prevail. Considers the SNA is unreasonable as it follows property boundaries rather than physical realities, the SNA is located in an urban area, data discontinuities exist. Notes the Wildlands report states that the significance is likely, but further work to confirm this is required. Contends that other ecological analysis do not place the same importance on the area as the Wildlands report (cites Park and MWH NZ). Considers the Darroch valuation report to justify approach to SNAs, which is considered flawed due to redaction, adoption of social benefit approach, Darroch being property valuers and therefore not being within their area of expertise, reliance on overseas data, the report being out of date (2019), and the wide range of valuation outcomes. Considers the SNA removes property rights from owners and sends a signal that native bush is a liability in the future and will have the unintended effect of promoting the removal of bush prior to an SNA being imposed. Considers there are anomalies in the analysis e.g. the SNA covers a road and bridge, significant bush removal has been undertaken in some areas including earthworks and retaining walls, the SNA covers sewer lines that will require bush clearance to maintain, it encompasses known areas of weeds and pests, and covers a stormwater detention pond that has likely resulted in some measure of contamination.	Retain SCHED8 as notified - with no Significant Natural Area applying to 11 Makomako Road.	Accept	No
Dominic Hurley	260.3	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Considers that site owners will lose control and value of their land due to SNA's. SNA's on land will drive owners to remove the native bush to avoid SNA status, having the opposite effect. Incentives should be offered instead.	Remove the Significant Natural Areas overlays from the PDP.	Reject	No
Horokiwi Quarries Ltd	271.93	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Opposes the extent of WC109 and seeks amendment to the boundary of SNA area WC109. [Refer to Figure 6 of the original submission for detail of the amended SNA boundary sought]. Considers that the removal of these areas from the wider SNA would not remove any value special to this area or diminish in a meaningful way the size or viability of the WC109 SNA, or faunal resource. It also does not change or affect buffering or connectivity.	Amend extent of WC109 (Coast escarpment broadleaved forest, Hutt Road between Ngauranga and Horokiwi) in SCHED8 – Significant Natural Areas. [Refer to original submission for attachments, including Figure 6 showing detail of the amended SNA boundary sought].	accept in part	yes
Horokiwi Quarries Ltd	271.94	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that there is a restrictive policy and rule framework that would apply to SNAs (and in particular where the sites are within a Coastal Environment overlay) and wishes to ensure any sites that are identified are in fact warranted as significant areas. Horokiwi does have concerns with particular areas on both its site and on the adjoining land to the west, in terms of whether the biodiversity values merit the specific areas being identified as SNAs. Based on the independent ecological assessment, Horokiwi seeks amendment to the SNA area identified. [Refer to original submission for full reason, including attachments]	Seeks that the Significant Natural Area overlay be amended as it relates to the Horokiwi quarry site including to remove the SNA from the Horokiwi site which is subject to the existing use certificate reference 1048648. [Refer to original submission, including figure and attachments]	reject	no
Onslow Residents Community Association	283.15	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Considers that significant Natural Areas on residential land can risk property owners removing the native bush to avoid status as an SNA. There are very few SNA's on residential land and the amount protected does not outweigh the loss to property value and further loss to biodiversity. [Refer to original submission for full reason]	Retain SCHED8 - Significant Natural Areas as notified (with no Significant Natural Areas on private residential land).	Accept	No

Jane Hurley	286.2	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	<p>Opposes significant natural area controls in residential areas and seeks that are not applied in residential areas as per the Council decision to notify the plan.</p> <p>Considers that SNAs:</p> <ul style="list-style-type: none"> - go against the principles of natural justice and are unconstitutional. - penalise people who have taken care of bush and incentivises clearing. -are a form of theft <p>[Refer to original submission for full reason]</p>	Retain Proposed District Plan as notified with no Significant Natural Area overlay in residential areas.	Accept	No
Tawa Community Board	294.19	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Considers that there are a number of currently zoned rural areas which under the Proposed District Plan will become residential type areas and the SNA protections will then not apply. These areas include the Upper Stebbings Valley Development area (including the area above Redwood Bush currently in private hands), and a number of large lot properties that were previously rural and are proposed to be designated as large lot residential zone, which includes those sections above the Peterhouse Street, Westhaven Drive and Westwood Road on the western hills of Tawa, and also Gladys Scott, Bing Lucas Drive and Woodburn Drive properties on the eastern hills of Tawa.</p> <p>The removal of the SNA designations on these properties puts at risk the removal of a large proportion of the green space landscape outlook that Tawa residents enjoy. It also risks being a pathway to allowing further intensive development on these sections. Such development would also place these steeper slope areas at risk to greater erosion effects, slippages (both from rain and seismic effects), and lead to even more flooding and sediment of the Porirua Stream and Porirua Harbour.</p>	Seeks that residential properties that were zoned as Rural under the Operative District Plan but have been rezoned to a Residential Zone in the Proposed District Plan retain their Significant Natural Areas.	Reject	No
Paul Blaschke	FS129.6	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Agrees this important rider for sites rezoned from Rural to Residential in the PDP. These particular sites not only have the important amenity and landscape and other values identified in the submission but have important ecological and connectivity values that are critical to retain within this expanding residential area.	Allow	Reject	No
Te Marama Ltd	337.15	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that SNAs should not be on private property.	Amend SCHED8 - Significant Natural Areas to not include SNAs on private property. [Inferred decision requested].	Reject	No
Te Marama Ltd	337.16	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Item WC054 (Makara Peak) should be removed from SCHED8 as it imposes an SNA on Te Marama property. WC054 states "Much of the site is WCC public land" and SNAs being imposed on public land is not opposed.	Amend SCHED8 - Significant Natural Areas to remove, Item WC054 (Makara Peak to not include 171 South Makara Road (Part Section 16 Makara DIST) and Lot 6 DP477282.	Reject	No
Yvonne Weeber	340.140	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	SCHED8 is generally supported.	Retain SCHED8 - Significant Natural Areas as notified	Accept in part	No
Paul Blaschke	FS129.14	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".	Allow	Accept in part	No

Yvonne Weeber	340.141	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC144 - South Wellington coastal cliffs scrub and shrubland in SCHED8. Considers that these cliffs represent the most significant coastal habitat of Wellington City.	Retain WC144 - South Wellington coastal cliffs scrub and shrubland in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.142	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC147 - Owhiro Bay and shore platform in SCHED8.	Retain WC147 - Owhiro Bay and shore platform in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.143	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC148 - Island Bay foreshore including Sirens Rock and Island Bay dunes in SCHED8.	Retain WC148 - Island Bay foreshore including Sirens Rock and Island Bay dunes in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.144	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC149 - Houghton Bay foreshore including Elsdon Point, Princess rock stacks and Princess Bay dunes in SCHED8.	Retain WC149 - Houghton Bay foreshore including Elsdon Point, Princess rock stacks and Princess Bay dunes in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.145	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC150 - Te Raekaihau Point Princess Bay in SCHED8.	Retain WC150 - Te Raekaihau Point Princess Bay in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.146	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC151 - Waitaha Cove duneland in SCHED8.	Retain WC151 - Waitaha Cove duneland in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.147	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC152 - Dorrie Leslie Park rocky coast in SCHED8.	Retain WC152 - Dorrie Leslie Park rocky coast in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.148	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC153 - Strathmore coastal shrubland in SCHED8.	Retain WC153 - Strathmore coastal shrubland in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.149	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC154 - Moa Point coastal platform and shrubland in SCHED8.	Retain WC154 - Moa Point coastal platform and shrubland in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.150	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC155 - Palmer Head rocky coast and Tarakena Bay duneland in SCHED8.	Retain WC155 - Palmer Head rocky coast and Tarakena Bay duneland in SCHED8 - Significant Natural Areas.	Accept	No

Yvonne Weeber	340.151	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC156 - Breaker Bay coastal scrub and forest remnants in SCHED8.	Retain WC156 - Breaker Bay coastal scrub and forest remnants in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.152	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC157 - Point Dorset coastal shrubland and duneland in SCHED8.	Retain WC157 - Point Dorset coastal shrubland and duneland in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.153	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC174 - Taputeranga Island in SCHED8.	Retain WC174 - Taputeranga Island in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.154	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC175 - Moa Point gravel dunes in SCHED8. These gravel dunes have a mix of plants and animal species living in this area that will be protected through this inclusion.	Retain WC175 - Moa Point gravel dunes in SCHED8 - Significant Natural Areas.	Accept	No
Yvonne Weeber	340.155	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion of WC176 - Lyall Bay dunes in SCHED8. These dune system have substantially increased since past practices of sand removal and sculpturing have stopped and dune planting and management have increased. Both plants such as pingao and spinifex have enable the dune to be stable for a number of years. Ongoing restoration planting and management is required to increase the distribution of dune planting between Maranui Surf Club building and the children's playground by Onepu Road.	Retain WC176 - Lyall Bay dunes in SCHED8 - Significant Natural Areas.	Accept	No
Royal Forest and Bird Protection Society	345.411	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports this schedule.	Retain SCHED8 - Significant Natural Areas as notified.	Accept in part	No
Greater Wellington Regional Council	351.345	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	<p>Though Greater Wellington supports WCC's identification of SNAs in line with RPS Policy 23, we oppose the omission of SNAs on private residential land from the Proposed District Plan (PDP) because:</p> <ul style="list-style-type: none"> the removal of identified SNAs from the PDP contradictory to national direction for indigenous biodiversity protection. Section 6(c) of the RMA 1991 states that 'the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna' is a matter of national importance, and that this matter must be 'recognised and provided for' by all persons exercising functions and powers under the RMA, including local authorities under Sections 30 and 31. the removal of SNAs on private residential land from the PDP is contrary to Policy 24 of RPS. Policy 24 directs district councils to include in their district plans policies, rules and methods to protect the indigenous ecosystems and habitats identified in accordance with policy 23. Policy 24 requires district councils to protect all areas identified in accordance with policy 23 through provisions in their district plans. the removal of identified SNAs on private residential land from the PDP to be inconsistent with WCC's vision and aspirations for protecting and restoring the city's indigenous biodiversity. The Our Natural Capital: Wellington's Biodiversity Strategy and Action Plan 2015[1] states that WCC will protect biodiversity by 'focussing on the protection of priority biodiversity sites on public and private land and rare, threatened, or locally significant species', and that it will build natural capital by 'respect[ing] the importance of indigenous biodiversity to New Zealand and its intrinsic right to exist'. We do not consider the exclusion of SNA on private residential land to align with this direction. 	Seeks to apply SNAs to all zones as intended by section 6 of the RMA and Policy 24 of the RPS.	Reject	No

Steve West	FS110.13	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Do not agree that reinstatement of SNAs on residential private property in the PDP is required for WCC to meet its obligations under section 6(c) of the RMA and policies 23/24 of the Regional Policy Statement for the following reasons: - Neither the RMA or RPS prescribe in detail how a council might give effect to the requirement to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna. The 2015 Environment Court case between Forrest & Bird and New Plymouth District Council the Environment Court concluded Councils might conceivably meet RMA Section 6(c) duties through methods other than identification and rules, but in this case the non-regulatory methods relied on by the Council were insufficient to provide protection. - Indigenous biodiversity in Wellington (including on private urban land) has increased significantly over the last 20 years, including Zealandia and Predator Free, along with voluntary conservation efforts without any need for SNAs. - Creating SNAs on private urban land will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner goodwill and value in the process. Real risk that indigenous biodiversity gains achieved over the last two decades will diminish should SNAs be created on	Disallow / Seeks that part of submission be disallowed and that already protected land (such as Captain Edward Daniell Drive) be removed from Schedule 9, should residential SNAs be reinstated. Seeks that: - WCC engages with GRWC to establish appropriate criteria in the RPS for Wellington City, so indigenous biodiversity that is actually significant is identified, rather than capturing vast areas with commonly found bush. - SNAs on private urban land remain excluded from the Proposed District Plan.	Accept in part	No
Greater Wellington Regional Council	351.346	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support in part	Supports WCC's identification and scheduling of SNAs in the PDP as per Policy 23 and 24 of the RPS.	Retain provision, subject to amendments, as outlined other submission points.	Accept in part	No
Greater Wellington Regional Council	351.347	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that based on Greater Wellington's analysis, several additional areas within WCC's jurisdiction meet one or more of the criteria in Policy 23.	Seeks the inclusion of the following sites as SNAs in the PDP: • areas of significant bird habitat in parts of Island Bay, Lyall Bay, Owhiro Bay, Tongue Point, Makara Estuary and Pipinui Point South; and • active and stabilised dunelands in Worsler Bay (southern end), Seatoun Beach, Churchill Park, Island Bay (north area, playground, south end), Owhiro Bay (southeast end), Waiariki Stream and Makara Beach (east end).	reject	no
Guardians of the Bays Inc	FS44.192	Part 4 / t Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Considers that it is known that Lyall Bay is a significant habitat for birds in particular the western end (non dog area) of Lyall Bay where redbill gulls and oyster catchers are daily visitors in good numbers.	Disallow	reject	no
Meridian Energy Limited	FS101.185	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Considers that it is not possible to determine whether the areas referred to should be included in SCHED8 without any detail in the submission of the geographical extent proposed to be defined.	Disallow / In the absence of specific detail, disallow the requested additions to SCHED8.	reject	no
Greater Wellington Regional Council	351.348	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Seeks that several site summaries for SNAs incorrectly refer to a Greater Wellington 'Biodiversity Management Area'. The correct term is 'Key Native Ecosystem' site.	Seeks to amend site descriptions for SNAs so that 'Key Native Ecosystem sites' are referred to instead of 'Biodiversity Management Areas', e.g., "Parts of this site are included in a GWRC Biodiversity Management Area Key Native Ecosystem area".	reject	no
Greater Wellington Regional Council	351.349	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Seeks that several site summaries for SNAs incorrectly refer to a Greater Wellington 'Biodiversity Management Area'. The correct term is 'Key Native Ecosystem' site.	Seeks for WCC to consider capturing all areas identified as, or overlapping with, Key Native Ecosystem (KNE) as SNAs in Appendix 8 (Quantitative wind study and qualitative wind assessment - modelling and reporting).	reject	no
Greater Wellington Regional Council	351.350	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Seeks that several site summaries for SNAs incorrectly refer to a Greater Wellington 'Biodiversity Management Area'. The correct term is 'Key Native Ecosystem' site.	Seeks for SNA sites name should, where possible, align with the KNE site that they are within.	reject	no

Richard Herbert	360.12	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support in part	Supports the provision of significant natural areas to protect the residual indigenous ecosystems and green areas in the context of the wellbeing of the wider population of the city build landscape, and the mitigation of climate change effects.	Retain SCHED8 - Significant Natural Areas with amendment.	Accept in part	No
Richard Herbert	360.13	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that SNAs should be reinstated on residential zones as originally proposed in earlier drafts of the Proposed District Plan, and prior to the Councillor Amendment to remove SNAs from Residential zones in June 2022. SNAs on Medium Residential Zones and Large Lot Residential Zones are supported. [Refer to original submission for full reason]	Reinstate Significant Natural Areas in Medium Density Residential Zones and Large Lot Residential Zones.	Reject	No
Paul Blaschke	FS129.9	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".	Allow	Reject	No
Te Kamaru Station Ltd Ratings	362.20	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that SNAs should not be on private property.	Amend SCHED8 - Significant Natural Areas to remove Significant Natural Areas on private property in both urban and rural environments. [Inferred decision requested].	Reject	No
Te Kamaru Station Ltd Ratings	362.21	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Item WC037 (Side gully off Shepherds Gully, Terawhiti Station) should be removed from SCHED8 as it is arbitrarily imposed. The imposition of SNAs will put at risk the voluntary and co-operative conservation programme Te Kamaru Station has made with Capital Kiwi. The programme works to ensure the rural landscape is fit for the return of kiwi. Negative impacts from this SNA may lead Te Kamaru Station to withdraw from the programme, should the legislative risk remain or worsen.	Delete Item WC037 (Side gully off Shepherds Gully, Terawhiti Station) from SCHED8 - Significant Natural Areas.	Reject	No
Te Kamaru Station Ltd Ratings	362.22	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Item WC042 (Scrub along Makara Stream tributary Quartz Hill No2) should be removed from SCHED8 as it is arbitrarily imposed. The imposition of SNAs will put at risk the voluntary and co-operative conservation programme Te Kamaru Station has made with Capital Kiwi. The programme works to ensure the rural landscape is fit for the return of kiwi. Negative impacts from this SNA may lead Te Kamaru Station to withdraw from the programme, should the legislative risk remain or worsen.	Delete Item WC042 (Scrub along Makara Stream tributary Quartz Hill No2) from SCHED8 - Significant Natural Areas.	Reject	No
Te Kamaru Station Ltd Ratings	362.23	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Item WC047 (Terawhiti Station shrubland) should be removed from SCHED8 as it is arbitrarily imposed. The imposition of SNAs will put at risk the voluntary and co-operative conservation programme Te Kamaru Station has made with Capital Kiwi. The programme works to ensure the rural landscape is fit for the return of kiwi. Negative impacts from this SNA may lead Te Kamaru Station to withdraw from the programme, should the legislative risk remain or worsen.	Delete Item WC047 (Terawhiti Station shrubland) from SCHED8 - Significant Natural Areas.	Reject	No
Te Kamaru Station Ltd Ratings	362.24	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Item WC049 (Terawhiti Farm Road forest remnants) should be removed from SCHED8 as it is arbitrarily imposed. The imposition of SNAs will put at risk the voluntary and co-operative conservation programme Te Kamaru Station has made with Capital Kiwi. The programme works to ensure the rural landscape is fit for the return of kiwi. Negative impacts from this SNA may lead Te Kamaru Station to withdraw from the programme, should the legislative risk remain or worsen.	Delete Item WC049 (Terawhiti Farm Road forest remnants) from SCHED8 - Significant Natural Areas.	Reject	No
Te Kamaru Station Ltd Ratings	362.25	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Item WC050 (Oteranga Bay Road forest remnant) should be removed from SCHED8 as it is arbitrarily imposed. The imposition of SNAs will put at risk the voluntary and co-operative conservation programme Te Kamaru Station has made with Capital Kiwi. The programme works to ensure the rural landscape is fit for the return of kiwi. Negative impacts from this SNA may lead Te Kamaru Station to withdraw from the programme, should the legislative risk remain or worsen.	Delete Item WC050 (Oteranga Bay Road forest remnant) from SCHED8 - Significant Natural Areas.	Reject	No

Te Kamaru Station Ltd Ratings	362.26	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Item WC119 (Nikau stand in side gully off Oteranga Strm, Terawhiti Stn.) should be removed from SCHED8 as it is arbitrarily imposed. The imposition of SNAs will put at risk the voluntary and co-operative conservation programme Te Kamaru Station has made with Capital Kiwi. The programme works to ensure the rural landscape is fit for the return of kiwi. Negative impacts from this SNA may lead Te Kamaru Station to withdraw from the programme, should the legislative risk remain or worsen.	Delete Item WC119 (Nikau stand in side gully off Oteranga Strm, Terawhiti Stn.) from SCHED8 - Significant Natural Areas.	Reject	No
Te Kamaru Station Ltd Ratings	362.27	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Item WC120 (Nikau and broadleaf forest side gully of South Karori golf course) should be removed from SCHED8 as it is arbitrarily imposed. The imposition of SNAs will put at risk the voluntary and co-operative conservation programme Te Kamaru Station has made with Capital Kiwi. The programme works to ensure the rural landscape is fit for the return of kiwi. Negative impacts from this SNA may lead Te Kamaru Station to withdraw from the programme, should the legislative risk remain or worsen.	Delete Item WC120 (Nikau and broadleaf forest side gully of South Karori golf course) from SCHED8 - Significant Natural Areas.	Reject	No
Te Kamaru Station Ltd Ratings	362.28	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Item WC121 (Tawa forest remnant Karori Golf Course, South Makara Road) should be removed from SCHED8 as it is arbitrarily imposed. The imposition of SNAs will put at risk the voluntary and co-operative conservation programme Te Kamaru Station has made with Capital Kiwi. The programme works to ensure the rural landscape is fit for the return of kiwi. Negative impacts from this SNA may lead Te Kamaru Station to withdraw from the programme, should the legislative risk remain or worsen.	Delete Item WC121 (Tawa forest remnant Karori Golf Course, South Makara Road) from SCHED8 - Significant Natural Areas.	Reject	No
WCC Environmental Reference Group	377.517	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support in part	Generally supportive but oppose the removal of residential SNAs.	Seeks to retain SCHED8 - Significant Natural Areas with amendments.	Accept in part	No
Paul Blaschke	FS129.12	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".	Allow	Reject	No
WCC Environmental Reference Group	377.518	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that Schedule 8 should include all the SNAs identified in the draft district plan version provided to the Council's environment committee from officers. "Wellington, wild at heart" is what our unique capital city trades upon - and as the population grows and urban areas densify, preserving and enhancing significant natural areas will become increasingly important. Research shows that access to natural areas, and 'biophilic' environments are keys to human health and well-being and are a critical part of protecting biodiversity. On this matter, Wellington as a city is playing a critical role in providing refuge for formerly at risk native birds, e.g. kaka, and with efforts such as the Halo Project and Predator Free initiatives being undertaken by thousands of Wellingtonians, it is important our city's district plan provides legal and policy support to this. The failure to include SNA areas in residential zones means that the district plan is not in accordance with section 6 of the RMA, nor is it giving effect to relevant provisions of GWRC's regional policy statement and regional plan.	Amend SCHED8 - Significant Natural Areas to add all the SNA areas in the residential zones recommended by officers in the draft district plan version provided to the Council's environment and planning committee on June 23 2022.	Reject	No

Steve West	FS110.19	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	<p>The original submitter seeks that Schedule 9 of the draft district plan be reinstated (adding back SNAs on private residential land), citing this exclusion is contradictory to both section 6(c) of the RMA and Policies 23/24 of the Regional Policy Statement.</p> <p>Steve West does not agree that reinstatement of SNAs on residential private property in the Proposed District Plan is required for WCC to meet its obligations under section 6(c) of the RMA and policies 23/24 of the Regional Policy Statement for the following reasons:</p> <ul style="list-style-type: none"> - Neither the RMA or RPS prescribe in detail how a council might give effect to the requirement to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna. On note, in the 2015 Environment Court case between Forrest & Bird and New Plymouth District Council the Environment Court concluded Councils might conceivably meet RMA Section 6(c) duties through methods other than identification and rules, but in this case the non-regulatory methods relied on by the Council were insufficient to provide protection. - In any case, indigenous biodiversity in Wellington (including on private urban land) has increased significantly over the last 20 years, including through activities like Zealandia and Predator Free, along with voluntary conservation efforts without any need for SNAs. These activities have contributed significantly to the recovery of birds like the Kaka, and proves the current voluntary conservation efforts are working well. - Creating SNAs on private urban land in the district plan will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner value and goodwill in the process. So rather than providing legal protection for our flora and fauna, there is real risk that indigenous biodiversity gains achieved over the last two decades will diminish over time 	Disallow / Seeks that SNAs on private urban land remain excluded from the Proposed District Plan.	Accept	No
Paul Blaschke	FS129.13	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".	Allow	Reject	No
Director-General of Conservation	385.88	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the Council to identify, map and protect the 177 identified Significant Natural Areas under SCHED8, in line with section 6 of the RMA.	Supports Council's efforts to identify, map and protect the 177 identified Significant Natural Areas under SCHED8.	Accept	No
Director-General of Conservation	385.89	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose in part	<p>Considers that there are likely to be significantly more wetland SNAs identified if the Policy 6 of the NPS-FM, Policy 23 of the RPS, and section 6(a) of the RMA were applied.</p> <p>The SNA report prepared for the Wellington City Proposed District Plan does not reference the NPS-FM. There are six SNAs that reference wetlands out of the notified 177 within the Plan.</p>	Seeks that all wetlands within Wellington City's boundaries should be properly identified and protected in accordance with the NPS-FM 2020.	Reject	No
Greater Wellington Regional Council	FS84.13	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Greater Wellington consider that the Proposed District Plan needs to avoid, remedy or mitigate adverse effects of urban development on wetlands in order to give effect to the NPS-FM and have regard to Proposed RPS Change 1.	Allow / Supports the submission in part and seeks provisions that ensure urban development is located and designed in a way that protects wetlands in accordance with the NPS-FM and Proposed RPS change 1 FW 3.	Reject	No
Royal Forest and Bird Protection Society of New Zealand Inc	FS85.2	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Wetlands that meet the definition of SNA should be protected at the District level.	Allow	Reject	No

Wellington City Council Environmental Reference Group	FS112.29	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Agree with the Director-General of Conservation that the proposed district plan needs to better reflect Policy 6 of the NPS-FM; Policy 23 of the RPS; and seek to protect wetlands within Wellington City Council’s boundaries.	Allow	Reject	No
Director-General of Conservation	385.90	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that there are likely to be significantly more wetland SNAs identified if the Policy 6 of the NPS-FM, Policy 23 of the RPS, and section 6(a) of the RMA were applied. The SNA report prepared for the Wellington City Proposed District Plan does not reference the NPS-FM. There are six SNAs that reference wetlands out of the notified 177 within the Plan.	Seeks amendment within schedule 8. Requests that all wetlands within Wellington City’s boundaries should be properly identified and protected in accordance with the NPS-FM 2020.	Reject	No
Royal Forest and Bird Protection Society of New Zealand Inc	FS85.3	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Wetlands that meet the definition of SNA should be protected at the District level.	Allow	Reject	No
Director-General of Conservation	385.91	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Oppose Council decision on 23 June 2022 at the Planning and Environment Committee on significant natural areas applying to residential land. Considers actions to be contrary to section 6(c) of the RMA and Policies 23 & 24 of the RPS. The SNAs on private land were originally proposed to be included in SCHED9 as ‘Urban Environment Allotments’ in accordance with the requirements of section 76 of the RMA. The section 32 report for Ecosystems and Indigenous Biodiversity still refers to SCHED9 as ‘Urban Environment Allotments’, though in the Proposed District Plan, SCHED9 is instead listed as ‘Indigenous Tree Sizes’. Considers that the removal of SNAs on private residential land will also be contrary to the exposure draft for the National Policy Statement for Indigenous Biodiversity. It is noted that this document has no legal effect, however, it is expected to come into effect in December 2022 during the further submissions and hearing process for the Proposed District Plan. It is considered effective and efficient to align the review of the Proposed District Plan provisions with the policy direction and requirements anticipated under the National Policy Statement on Indigenous Biodiversity.	Opposes significant natural areas not applying to residential land, seeks amendment.	Reject	No
Greater Wellington Regional Council	FS84.16	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Greater Wellington strongly support this submission and agree that excluding SNAs from residential land, particularly without any other protections, does not achieve Part 2 of the RMA or give effect to the Operative RPS.	Allow	Reject	No
Kāinga Ora – Homes and Communities	FS89.55	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Further clarification is needed to understand the implications on land use opportunities of applying significant natural areas. Kāinga Ora supports the protection of the values of SNAs but seeks that these are mapped and identified in the District Plan.	Disallow	Accept in part	No

Steve West	FS110.21	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	<p>Steve West does not agree that reinstatement of SNAs on residential private property in the Proposed District Plan is required for WCC to meet its obligations under section 6(c) of the RMA and policies 23/24 of the Regional Policy Statement for the following reasons:</p> <ul style="list-style-type: none"> - Section 5 of the RMA requires balancing of physical and natural resources, as well as enabling persons to provide for their social, economic and cultural well-being, and for their health and safety. By narrowly quoting section 6(c) the context of needing to balance outcomes has been lost. - Neither the RMA or RPS prescribe in detail how a council might give effect to the requirement to protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna. On note, in the 2015 Environment Court case between Forrest & Bird and New Plymouth District Council the Environment Court concluded Councils might conceivably meet RMA Section 6(c) duties through methods other than identification and rules, but in this case the non-regulatory methods relied on by the Council were insufficient to provide protection. - Parts of policies 23/24 of the Regional Policy Statement are flawed for Wellington City, these matters are addressed in the further response to submission 351 above. - Indigenous biodiversity in Wellington (including on private urban land) has increased significantly over the last 20 years, including Zealandia and Predator Free, along with voluntary conservation efforts without any need for SNAs. - Creating SNAs on private urban land will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner value and goodwill in the process. Real risk that indigenous biodiversity gains over the last two decades will diminish over time should SNAs be created on private urban land. - Specifically for Captain Edward Daniell Drive, indigenous biodiversity is already 	<p>Disallow / Seeks that the submission be rejected in part and seeks that:</p> <ul style="list-style-type: none"> - When identifying (ground truthing) individual SNAs that WCC is required to provide accurate cadastral markings of the SNA boundary and set individual land policies and rules in conjunction with each landowner in a way that will limit landowner losses while providing the required indigenous biodiversity protection. - SNAs on private urban land remain excluded from the Proposed District Plan. - Already protected land (such as Captain Edward Daniell Drive) be removed from Schedule 9, should residential SNAs be reinstated. 	Accept in part	No
Paul Blaschke	FS129.7	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	<p>Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".</p>	Allow	Reject	No
Director-General of Conservation	385.92	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	<p>Oppose Council decision on 23 June 2022 at the Planning and Environment Committee on significant natural areas applying to residential land.</p> <p>SNAs are considered a 'qualifying matter' under the National Policy Statement for Urban Development (NPS-UD), meaning that the intensification requirements of the NPS-UD should not apply in these areas. The new Medium and High Density Residential Zones of the Proposed District Plan include enabling standards to provide for intensification and increased housing opportunities in accordance with the requirements of the NPS-UD8, however SNAs have been removed from the private land in these zones.</p> <p>The submitter holds concerns that the NPS-UD rules will have legal effect or become operative, before the missing SNAs are incorporated into the District Plan which could lead to the inappropriate removal of significant indigenous vegetation and the loss of significant habitats of indigenous fauna. Even without the consideration of the NPS-UD rules, there is concern that inappropriate development will take place in residential areas that should be protected by the SNA status.</p>	Opposes significant natural areas not applying to residential land, seeks amendment.	Reject	No
Kāinga Ora – Homes and Communities	FS89.56	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	<p>Further clarification is needed to understand the implications on land use opportunities of applying significant natural areas.</p> <p>Kāinga Ora supports the protection of the values of SNAs but seeks that these are mapped and identified in the District Plan.</p>	Disallow	Accept	No

Wellington City Council Environmental Reference Group	FS112.30	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Agree with the Director-General of Conservation that there is a very real risk of inappropriate development in residential areas in new medium and high density zones (in accordance with the NPS-UD) by SNAs in residential areas not being included: this reflects that SNAs are a ‘qualifying matter’ under the NPS-UD.	Allow	Reject	No
Paul Blaschke	FS129.8	Part 4 / Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".	Allow	Reject	No
Wellington International Airport Ltd	406.549	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Opposes the mapped extent of the Lyall Bay and Moa Point Dunes. [See paragraphs 4.50 to 4.53 of original submission for full reason]	Delete item WC175 (Moa Point Gravel Dunes) from SCHED8 - Significant Natural Areas.	Reject	No
Guardians of the Bays Inc	FS44.188	Mapping / Rezone / Rezone	Oppose	Considers these are significant natural areas of Wellington City. The local community have undertaken significant coastal restoration of the sand dunes at Lyall Bay and predator control of both areas. The sand dunes on Lyall Bay are a significant barrier to sea level rise and coastal inundation for both the community and the airport. The Moa Point dunes also protect the road, coastal community and airport. Removal from any zone in this area should not occur.	Disallow	Accept	No
Wellington International Airport Ltd	406.550	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Oppose	Opposes the mapped extent of the Lyall Bay and Moa Point Dunes. [See paragraphs 4.50 to 4.53 of original submission for full reason]	Delete item WC176 (Lyall Bay Dunes) from SCHED8 - Significant Natural Areas.	Reject	No
Guardians of the Bays Inc	FS44.189	Mapping / Rezone / Rezone	Oppose	Considers these are significant natural areas of Wellington City. The local community have undertaken significant coastal restoration of the sand dunes at Lyall Bay and predator control of both areas. The sand dunes on Lyall Bay are a significant barrier to sea level rise and coastal inundation for both the community and the airport. The Moa Point dunes also protect the road, coastal community and airport. Removal from any zone in this area should not occur.	Disallow	Accept	No
Wellington International Airport Ltd	406.551	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	There are two SNAs identified in the vicinity of the Airport. These are WC175 and WC176. The analysis of the site acknowledges that the assessment was based on a desktop analysis and these sites require site visits. The submitter considers that the presence of the SNA in such close proximity to the runway poses a potential risk to aircraft due to some of the bird species that reside in this area. While WIAL has mechanisms in place to actively manage such threats to aircraft safety, WIAL considers it is more appropriate to avoid enhancing habitats that have the potential to create a risk to aircraft in close proximity to the Airport and instead encourage them to locate elsewhere within the coastal environment.	Requests that the following SNAs are deleted in their entirety from SCHED8: - The Moa Point Gravel Dunes (WC175); and - The Lyall Bay Gravel Dunes (WC176). The submitter notes that a site visit is needed for these sites if they are to be included in the SCHED8. (Option A).	Reject	No
Guardians of the Bays Inc	FS44.190	Mapping / Rezone / Rezone	Oppose	Considers these are significant natural areas of Wellington City. The local community have undertaken significant coastal restoration of the sand dunes at Lyall Bay and predator control of both areas. The sand dunes on Lyall Bay are a significant barrier to sea level rise and coastal inundation for both the community and the airport. The Moa Point dunes also protect the road, coastal community and airport. Removal from any zone in this area should not occur.	Disallow	Accept	No

Wellington International Airport Ltd	406.552	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>There are two SNAs identified in the vicinity of the Airport. These are WC175 and WC176. The analysis of the site acknowledges that the assessment was based on a desktop analysis and these sites require site visits.</p> <p>The submitter considers that the presence of the SNA in such close proximity to the runway poses a potential risk to aircraft due to some of the bird species that reside in this area. While WIAL has mechanisms in place to actively manage such threats to aircraft safety, WIAL considers it is more appropriate to avoid enhancing habitats that have the potential to create a risk to aircraft in close proximity to the Airport and instead encourage them to locate elsewhere within the coastal environment.</p>	Should the SNAs remain in the plan, the submitter seeks that the relevant infrastructure provisions of the Proposed Plan provide a potential consenting pathway for the potential removal of vegetation within these SNAs where necessary to protect the safe operation and functioning of regionally significant infrastructure. (Option B).	Reject	No
Guardians of the Bays Inc	FS44.191	Mapping / Rezone / Rezone	Oppose	<p>Considers that Significant Natural Areas should be in close vicinity of the airport. The airport in the 'vicinity' of the SNA's should not be a reason for their removal. Measures such as bird control should be the method of reducing bird strike rather than requiring the removal of a SNA.</p>	Disallow	Accept	No
Cheryl Robilliard	409.8	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	[No specific reason given beyond decision requested - see original submission]	<p>Retain SCHED8 - Significant natural areas as notified.</p> <p>[Inferred decision requested]</p>	Accept in part	No
Terawhiti Farming Co Ltd (Terawhiti Station)	411.26	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Oppose SNAs on private property.</p> <p>Considers that sites have been incorrectly identified.</p> <p>Considers that a regulatory regime puts voluntary conservation programmes at risk.</p> <p>[See original submission for full reasons]</p>	<p>Seeks that SNA overlays WC030, WC031, WC033, WC172, WC121 are removed from the following title:</p> <p>Fee Simple, 1/1, Lot 4 Deposited Plan 375401 and Section 1-4, 8, 10-13, 13A, 14-16, 19-26, 26, 29-32, 51-52, 55-59, 94, 17, 17, 17, 98, 98, 98, 98 Terawhiti District and Part Section 9, 33, 50, 54, 60-64, 73, 75 Terawhiti District and Lot 3 Deposited Plan 5864 and Lot 3 Deposited Plan 5864 and Lot 3 Deposited Plan 5864 and Lot 3 Deposited Plan 5864 and Lot 3 Deposited Plan 5864 and Lot 3 Deposited Plan 5864 and Lot 3 Deposited Plan 5864, 26,748,701 m2</p>	Reject	No
Terawhiti Farming Co Ltd (Terawhiti Station)	411.27	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Oppose SNAs on private property.</p> <p>Considers that sites have been incorrectly identified.</p> <p>Considers that a regulatory regime puts voluntary conservation programmes at risk.</p> <p>[See original submission for full reasons]</p>	[Inferred decision requested] Seeks that significant natural areas do not apply to privately owned land.	Reject	No
Penny Griffith	418.6	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the removal of SNA's from residentially zoned land.	Retain SCHED8 - Significant Natural Areas as notified (With no Significant Natural Areas on residentially zoned land).	Accept	No
Johnsonville Community Association	429.43	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support in part	<p>Considers that unilaterally taking over of private property is a major intrusion on rights of the property owners, and may lead to removal of major natural areas on urban property.</p> <p>Opposes SNA's on private urban or rural land.</p>	<p>Retain SCHED8 - Significant Natural Areas, with respect to not having Significant Natural Areas on private urban property.</p> <p>[Inferred decision requested].</p>	Accept	No
Johnsonville Community Association	429.44	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Considers that unilaterally taking over of private property is a major intrusion on rights of the property owners, and may lead to removal of major natural areas on urban property.</p> <p>Opposes SNA's on private urban or rural land.</p>	Amend SCHED8 - Significant Natural Areas, to remove Significant Natural Areas from private rural land.	Reject	No

Paul M Blaschke	435.13	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Considers that the Council should allow SNAs on residentially zoned properties. The Council should be consistent with its overall policy objectives and let its original decisions on SNAs stand on their merits. The decision from Council's Planning & Environment Committee to remove SNAs from all residentially zoned properties on 23 June 2022 is opposed. This decision renders the Ecosystems and Indigenous Biodiversity section much less effective than it could and should be. It greatly hinders the achievement of Council's Te Atakura blueprint and other moves towards sustainability and resilience. It disadvantages the great majority of the city's residents except for a tiny number of suburban residential landowners who become privileged over all others including other suburban residential landowners with portions of SNAs within their properties and who have welcomed or not objected to the provisions. It overturns the very good process adopted by the council team and consultants who have planned and undertaken the SNA survey and policy development. Finally, it renders ECO-O1, ECO-P1, ECO-P2, and ECO-P3, and the rules supporting these objectives and policies, incapable of being properly implemented, and perpetuates the uncertainty caused by lack of a comprehensive statutory process around significant areas and indigenous biodiversity. [Refer to original submission for full reason]	Seeks to extend Significant Natural Areas to residentially zoned properties.	Reject	No
Paul M Blaschke	435.14	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	SCHED8 is strongly supported for its general direction.	Retain SCHED8 -Significant Natural Areas as notified.	Accept	No
Guardians of the Bays	452.99	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion WC153 Strathmore coastal shrubland in Schedule 8 of the significant natural areas.	Retain WC153 Strathmore coastal shrubland in Schedule 8 of the significant natural areas as notified.	Accept	No
Guardians of the Bays	452.100	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion WC154 Moa Point coastal platform and shrubland in Schedule 8 of the significant natural areas.	Retain WC154 Moa Point coastal platform and shrubland in Schedule 8 of the significant natural areas as notified.	Accept	No
Guardians of the Bays	452.101	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion WC175 Moa Point gravel dunes in Schedule 8 of the significant natural areas.	Retain WC175 Moa Point gravel dunes in Schedule 8 of the significant natural areas as notified.	Accept	no
Guardians of the Bays	452.102	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Support	Supports the inclusion WC176 Lyall Bay dunes in Schedule 8 of the significant natural areas.	Retain WC176 Lyall Bay dunes in Schedule 8 of the significant natural areas as notified.	Accept	no
Grant and Marilyn Griffiths, Griffiths Family Trust	460.3	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	Opposes Significant Natural Areas on Private land.	Seeks to remove all Significant Natural Areas from Private Land.	Reject	No

Smith Geursen	475.2	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Not specified	Considers that it could be argued that an area of land should not have special environmental protections (SNA) based on aspirational outcomes (possible regeneration of certain species) unless it had been carefully assessed by an ecologist to confirm that it was desired native species that would likely become dominant (rather than invasive ones).	Not specified.	Accept in part	No
Smith Geursen	475.3	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas fit the description in WC135 and should be protected as a SNA.</p> <p>Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA.</p> <p>Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA.</p> <p>Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA.</p> <p>Considers that some parts of the site have been cleared recently, as a complying activity, and as such do not represent the habitat that would benefit from protection. These areas should be excluded from the SNA as the ecological value is now largely lost.</p> <p>[Refer to original submission for full detail, including diagrams].</p>	<p>Seeks that the extent of the area encompassed by WC135 (Carey Gully scrub and shrubland, South Coast) in SCHED8 - Significant Natural Areas is altered to:</p> <ul style="list-style-type: none"> - Encompass the 3m+ vegetation that is north and west of the loop shaped farm track; and - Also encompass the stand of 3m+ vegetation in the centre to the south of the site. <p>[The new boundaries suggested for WC135 (Carey Gully scrub and shrubland, South Coast) are approximated in Figure 8 in the submission]</p>	Accept in part	Yes
John Mulholland	497.3	Schedules Subpart / Schedules / SCHED8 – Significant Natural Areas	Amend	<p>Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas fit the description in WC135 and should be protected as a SNA.</p> <p>Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA.</p> <p>Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA.</p> <p>Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA.</p> <p>Considers that some parts of the site have been cleared recently, as a complying activity, and as such do not represent the habitat that would benefit from protection. These areas should be excluded from the SNA as the ecological value is now largely lost.</p> <p>[Refer to original submission for full detail, including diagrams].</p>	<p>Seeks that the extent of the area encompassed by WC135 (Carey Gully scrub and shrubland, South Coast) in SCHED8 - Significant Natural Areas is altered to:</p> <ul style="list-style-type: none"> - Encompass the 3m+ vegetation that is north and west of the loop shaped farm track; and - Also encompass the stand of 3m+ vegetation in the centre to the south of the site. <p>The new boundaries suggested for WC135 (Carey Gully scrub and shrubland, South Coast) are approximated in Figure 8 in the submission.</p>	Accept in part	Yes

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Meridian Energy Limited	228.27	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Oppose in part	<p>Considers that the Introduction to the INF-ECO chapter should include, under the heading 'Other relevant District Plan provisions', a statement that seeks to clarify the interaction between the INF-ECO chapter and other Plan chapters.</p> <p>Meridian understood the intention of the Plan to be that the rules for renewable electricity generation activities, structures and buildings would be wholly contained in the REG chapter. Meridian supports this approach.</p> <p>Considers the note in the preamble is not entirely helpful in clarifying this.</p> <p>Meridian accepts that the objectives and policies of the ECO Ecosystems and Indigenous Biodiversity chapter are applicable to renewable electricity generation activities. However, considers the standards listed for general infrastructure activities in the INF-ECO chapter are entirely inappropriate for renewable electricity generation activities and structures and should not be construed as a 'permitted baseline' for renewable electricity generation activities there, and particularly not for existing wind farms.</p>	Retain the Introduction to Chapter INF-ECO with amendment.	Reject	No
Meridian Energy Limited	228.28	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Amend	<p>Considers that the Introduction to the INF-ECO chapter should include, under the heading 'Other relevant District Plan provisions', a statement that seeks to clarify the interaction between the INF-ECO chapter and other Plan chapters.</p> <p>Meridian understood the intention of the Plan to be that the rules for renewable electricity generation activities, structures and buildings would be wholly contained in the REG chapter. Meridian supports this approach.</p> <p>Considers the note in the preamble is not entirely helpful in clarifying this.</p> <p>Meridian accepts that the objectives and policies of the ECO Ecosystems and Indigenous Biodiversity chapter are applicable to renewable electricity generation activities. However, considers the standards listed for general infrastructure activities in the INF-ECO chapter are entirely inappropriate for renewable electricity generation activities and structures and should not be construed as a 'permitted baseline' for renewable electricity generation activities there, and particularly not for existing wind farms.</p>	<p>Amend the Introduction to Chapter INF-ECO, by inserting under the heading 'Other relevant District Plan provisions', the following (or similar) clarification note:</p> <p><u>The rules applicable to renewable electricity generation activities are contained in Chapter REG Renewable Electricity Generation. The rules in Chapter INF-ECO Infrastructure Ecosystems and Indigenous Biodiversity do not apply to renewable electricity generation activities.</u></p>	Reject	No

Transpower New Zealand Limited	315.104	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Amend	<p>Considers Transpower’s operational activities involve upgrading and ‘recutting’ access tracks, vegetation trimming and vegetation removal. Transpower’s maintenance and climate change adaptation activities will involve making foundations stronger/bigger, and relocating assets (among other things). Transpower is required to clear paths and undertake vegetation trimming/clearance to:</p> <ul style="list-style-type: none"> • Ensure clearance under and adjacent to the lines; • Provide access to the lines and support structure assets, including for fault response purposes; • Enable maintenance of support structures including painting, foundation strengthening and replacement; and • Reconductor lines. <p>Transpower has a cyclical maintenance programme, but typically inspections can occur any time between 6 and 18 months. The decision to trim or clear vegetation on inspection depends on factors such as the age of the support structure, nature of the vegetation, landowner relationships, and the operational requirements of the asset. The requirement to provide sufficient clearance under the lines is a regulatory requirement of the Electricity (Hazards from Trees) Regulations 2003. Clearance is required for safety reasons (primarily to prevent flashovers). While trimming/ clearance is a safety requirement, it is subject to local authority plan provisions (such as when the site is an SNA which is a ‘Natural Area’ for the purpose of the National Environmental Standards for Electricity Transmission Activities (NESETA)). Considers that it is important that it is recognised in the PDP that some of these activities will have unavoidable impacts and will sometimes be in SNAs given the extent and location of Transpower’s</p>	Seeks to amend the Infrastructure - Ecosystems and Indigenous Biodiversity (INF-ECO) chapter provisions to recognise and provide for the National Grid as set out in subsequent submission points.	Accept in Part	Yes
Transpower New Zealand Limited	315.105	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Amend	Supports the introductory text but seeks clarification that the National Grid is subject to specific policies and rules and the general sub-chapter provisions do not apply.	<p>Amend the introduction to the Infrastructure - Ecosystems and Indigenous Biodiversity (INF-ECO) as follows:</p> <p>This sub-chapter applies to infrastructure within Natural Features and Landscape Overlays. It applies in addition to the principal Infrastructure Chapter.</p> <p><u>Included within the sub-chapter are provisions specific to the National Grid (NG) and Gas Transmission Pipelines Corridor (GTPC).</u> <u>For the avoidance of doubt, other sub-chapter policies and rules within this sub-chapter do not apply to the National Grid.</u></p> <p>Note: The objectives of the Infrastructure Chapter apply.</p>	Accept in Part	Yes
Transpower New Zealand Limited	315.106	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Oppose in part	Considers that on the basis INF-ECO-R44 is to be amended [as requested in other submission point regarding this rule] so it does not apply to the National Grid, considers Standard S19 will not be applicable to the National Grid. If the intent is for S19 to apply to the National Grid Transpower opposes its application as the submitter considers the NESETA manages vegetation works for existing National Grid infrastructure and the provision of a standard to apply to the National Grid adds unnecessary confusion and interpretation issues.	Opposes reference to INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) in any National Grid specific rules.	Accept in Part	Yes

Transpower New Zealand Limited	315.107	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Amend	Considers that on the basis INF-ECO-R44 is to be amended [as requested in other submission point regarding this rule] so it does not apply to the National Grid, considers Standard S19 will not be applicable to the National Grid. If the intent is for S19 to apply to the National Grid, Transpower opposes its application as the submitter considers the NESETA manages vegetation works for existing National Grid infrastructure and the provision of a standard to apply to the National Grid adds unnecessary confusion and interpretation issues.	Seeks to delete reference to INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) from any National Grid specific rules.	Accept in Part	Yes
Transpower New Zealand Limited	315.108	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Oppose in part	Considers that on the basis INF-ECO-R44 is to be amended so it does not apply to the National Grid, INF-ECO-S20 will not be applicable to the National Grid. If the intent is for INF-ECO S20 to apply to the National Grid Transpower opposes its application as it duplicates the NESETA and adds unnecessary confusion and interpretation issues.	Opposes reference to INF-ECO-S20 (Earthworks within a significant natural area) in any National Grid specific rules.	Accept	Yes
Transpower New Zealand Limited	315.109	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Amend	Considers that on the basis INF-ECO-R44 is to be amended so it does not apply to the National Grid, Standard S20 will not be applicable to the National Grid. If the intent is for S20 to apply to the National Grid Transpower opposes its application as it duplicates the NESETA and adds unnecessary confusion and interpretation issues.	Seeks to delete reference to INF-ECO-S20 (Earthworks within a significant natural area) from any National Grid specific rules.	Accept	Yes
Royal Forest and Bird Protection Society	345.57	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Support in part	Notes that the introduction to this sub-chapter states that the objectives of the Infrastructure chapter apply. Further, that this sub-chapter applies in addition to the Infrastructure chapter. That means that both the policies in the Infrastructure chapter as well as those in this sub-chapter will apply to use and development in SNAs. Forest & Bird's overarching submission for this chapter is that the provisions should be no less protective than those in the ECO chapter. The provisions in this chapter should mirror the ECO provisions, with the amendments made as sought by F&B in respect of that chapter.	Amend chapter to mirror ECO - Ecosystems and Indigenous Biodiversity chapter to apply a similar level of protection.	Accept	Yes
Transpower New Zealand Limited	FS29.22	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Oppose	Given the general nature of the relief sought, Transpower opposes the submission point.	Disallow / Seeks that submission is disallowed in part in so far as the relief sought is inconsistent with that sought in Transpower's submission.	Reject	No
Wellington International Airport Limited	FS36.71	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Oppose	WIAL opposes the relief sought by the submitter as it is appropriate for a different planning framework to apply for regionally significant infrastructure in recognition of the social, cultural and economic benefits it provides for the community and the operational and locational constraints of that infrastructure.	Disallow	Reject	No
Meridian Energy Limited	FS101.48	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Oppose	Meridian does not agree that the objectives for significant natural areas (in the SNA chapter) should be replicated in this INF-ECO chapter.	Disallow	Reject	No

Waka Kotahi NZ Transport Agency	FS103.10	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Oppose	The purpose of this chapter is evidently to help understand the balance and reconcile the need to provide for infrastructure with the need to protect areas of important biodiversity. It is therefore not appropriate to mirror the level of stringency in the ECO chapter as applied more broadly.	Disallow	Reject	No
WCC Environmental Reference Group	377.39	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Support	Supportive of the entire sub-chapter as it is logical and strikes a good balance between use and protection.	Retain the Infrastructure (Ecosystems and Biodiversity) chapter as notified.	Accept in Part	No
Taranaki Whānui ki te Upoko o te Ika	389.57	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Amend	[No specific reason given beyond decision requested - refer to original submission].	Amend 'Other relevant District Plan provisions' to include Sites and Areas of Significance to Māori chapter.	Reject	No
Greater Wellington Regional Council	FS84.120	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Support	Greater Wellington support the inclusion and protection of SASM.	Allow / Seek provisions which protect SASM.	Reject	No
Transpower New Zealand Limited	315.110	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Amend	<p>Considers that Transpower has existing assets within identified SNAs [see full submission for image supplied].</p> <p>Transpower is required to undertake vegetation trimming/clearance necessary for the safe and efficient operation, maintenance, upgrading and development of the National Grid, including (but not limited to) trimming that may be required by the Electricity (Hazards from Trees) Regulations 2003. Related, is the operational requirement for clearance of vegetation on access tracks to enable Transpower to access the grid infrastructure to undertake its operation, maintenance and upgrade. Submitter considers the policy does not give effect to the NPS-ET. Considers the policy directive within INF-ECO-P35 that works "do not adversely affect the biodiversity values" does not give effect to the NPS-ET. Considers the policy is drafted such that all and any adverse effects are to be avoided. Considers that such a requirement is onerous given the policy relates to existing infrastructure which will often have safety requirements and obligations in respect of adjacent vegetation. Transpower seeks amendment to the policy to reflect the realities of maintaining the National Grid and ensuring safe and necessary vegetation clearance distances.</p> <p>(Option B) [Refer to original submission for full reason]</p>	<p>Add a new National Grid specific policy as follows:</p> <p><u>INF-NG-P2 Operation, and maintenance and minor upgrade of the National Grid</u></p> <p><u>Provide for the operation, maintenance and minor upgrade of the National Grid while managing the adverse effects of these activities.</u></p>	Accept in Part	Yes

Transpower New Zealand Limited	315.111	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Amend	The submitter does not oppose the identification of SNAs, but considers the policy approach has to be cognisant of the need to develop the National Grid and also give effect to the NPS-ET. Transpower proposes an amended policy approach specific to the National Grid [in general]. Considers that key to the approach is the recognition of the need to provide and enable the National Grid, whilst also providing a robust framework to manage effects. Specific to INF-ECO-P37, while Transpower accepts the policy does have regard to the route, site and method selection process, and operational needs, considers they apply in context of the policy chapeau to 'give priority to avoiding adverse effects'. Submitter queries how the term "give priority to avoiding adverse effects" would be implemented. Queries if this requires avoidance as the default position. Transpower's preference is for development within SNA's to be addressed in the specific National Grid development policy (within the INF chapter). Considers this would enable any new National Grid development to be considered in a comprehensive manner.	Add new National Grid specific policy to replace INF-ECO-P37 (New development of National Grid within significant natural areas) as follows: INF-NG-P6 Development of the National Grid <u>Provide for the development of the National Grid</u> <u>1. In urban zoned areas, development should minimise adverse effects on urban amenity and should avoid material adverse effects on the Commercial and Mixed-Use zones, and areas of high recreational or amenity value and existing sensitive activities.</u> <u>2. Seek to avoid the adverse effects of the National Grid within areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED8 - Significant Natural Areas, and SCHED11 – Special Amenity Landscapes, outside the coastal environment.</u> <u>3. Where the National Grid has a functional need or operational need to locate within the coastal environment, manage adverse effects by:</u> <u>a. Seeking to avoid adverse effects on areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes, and the Coastal Margin.</u> <u>b. Where it is not practicable to avoid adverse effects on the values of the areas in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on those values.</u> <u>c. Seeking to avoid significant adverse effects on:</u> <u>i. other areas of natural character</u> <u>ii. natural attributes and character of other natural features and natural landscapes</u> <u>iii. indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010</u> <u>d. Avoiding, remedying or mitigating other adverse effects to the extent practicable; and</u> <u>e. Recognising there may be some areas within SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas</u>	Accept in Part	Yes
Royal Forest and Bird Protection Society	345.58	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Amend	Considers Policy 11 of NZCPS is not given effect to by the current policies. Seeks new policy to do so.	Add new policy INF-ECO-PX (All infrastructure activities in the coastal environment): <u>Only allow activities within a significant natural area in the coastal environment where it can be demonstrated that they:</u> <u>1. Avoid adverse effects on the matters in Policy 11(a) of the New Zealand Coastal Policy Statement 2010;</u> <u>2. Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on the matters in Policy 11(b) of the New Zealand Coastal Policy Statement 2010; and</u> <u>3. Protect other indigenous biodiversity values in accordance with ECO-P1</u>	Reject	No
Transpower New Zealand Limited	FS29.23	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Oppose	In its submission Transpower seeks a specific National Grid policy approach to give effect to the NPSET and the NZCPS.	Disallow / Seeks that submission is disallowed in part in so far as the relief sought is inconsistent with that sought in Transpower's submission.	Accept	No

Meridian Energy Limited	FS101.49	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Oppose	Meridian considers that, taken together, the objectives and policies of the INF-ECO chapter do give effect to the NZCPS.	Disallow	Accept	No
Wellington International Airport Ltd	406.143	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Amend	<p>Considers that that a new policy and method is required to allow for the removal of vegetation within significant natural areas where necessary to provide for the safe and/or efficient operation of regionally significant infrastructure.</p> <p>[See paragraphs 4.50 to 4.55 in original submission for full reason]</p>	<p>Add new policy as follows:</p> <p><u>INF-ECO-P38 Appropriate vegetation removal in significant natural areas</u></p> <p><u>Enable vegetation removal within significant natural areas identified within SCHED8 where:</u></p> <p><u>1. The vegetation removal is required to provide for the ongoing and safe operation of regionally significant infrastructure; and,</u></p> <p><u>2. Any adverse effects on indigenous biodiversity values within a significant natural area are considered in accordance with ECO-P1.</u></p>	Reject	No
KiwiRail Holdings Limited	FS72.32	Part 2 / District-Wide Matters / Energy, Infrastructure, and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Support	<p>Supports provisions that allow for vegetation removal within SNA's as required for the safe and efficient operation of regionally significant infrastructure such as rail.</p> <p>Considers the relief sought should be allowed because it will (a) will promote the sustainable management of the natural and physical resources in Wellington City, and is therefore consistent with Part 2 and other provisions of the Resource Management Act 1991 (RMA) and the Enabling Housing Supply Amendment Act 2021 (Amendment Act); (b) is consistent with other relevant planning documents, including the Greater Wellington Regional Policy Statement and National Policy Statement for Urban Development 2020; (c) will meet the reasonably foreseeable needs of future generations; (d) will avoid, remedy or mitigate actual and potential adverse effects on the environment; (e) will enable the social, economic and cultural wellbeing of the people of Wellington City; and (f) is the most appropriate way to achieve the objectives of the Proposed Plan in terms of section 32 of the RMA.</p>	Allow	Reject	No
Meridian Energy Limited	FS101.50	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Support	Meridian agrees that the additional policy and proposed new rule, providing for appropriate vegetation removal in significant natural areas, have merit.	Allow	Reject	No

Wellington International Airport Ltd	406.144	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Amend	<p>Considers that that a new policy and method is required to allow for the removal of vegetation within significant natural areas where necessary to provide for the safe and/or efficient operation of regionally significant infrastructure.</p> <p>[See paragraphs 4.50 to 4.55 in original submission for full reason]</p>	<p>Add new rule as follows:</p> <p><u>INFR-ECO-R43A</u></p> <p><u>All Zones</u></p> <p><u>Removal of vegetation within significant natural areas to protect regionally significant infrastructure</u></p> <p><u>1. Activity Status: Restricted discretionary</u></p> <p><u>Matters of discretion are:</u></p> <p><u>3. The matters in INF-ECO-P38</u></p>	Reject	No
KiwiRail Holdings Limited	FS72.33	Part 2 / District-Wide Matters / Energy, Infrastructure, and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Support	<p>Supports provisions that allow for vegetation removal within SNA's as required for the safe and efficient operation of regionally significant infrastructure such as rail.</p> <p>Considers the relief sought should be allowed because it will (a) will promote the sustainable management of the natural and physical resources in Wellington City, and is therefore consistent with Part 2 and other provisions of the Resource Management Act 1991 (RMA) and the Enabling Housing Supply Amendment Act 2021 (Amendment Act); (b) is consistent with other relevant planning documents, including the Greater Wellington Regional Policy Statement and National Policy Statement for Urban Development 2020; (c) will meet the reasonably foreseeable needs of future generations; (d) will avoid, remedy or mitigate actual and potential adverse effects on the environment; (e) will enable the social, economic and cultural wellbeing of the people of Wellington City; and (f) is the most appropriate way to achieve the objectives of the Proposed Plan in terms of section 32 of the RMA.</p>	Allow	Reject	No
Meridian Energy Limited	FS101.51	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Support	Meridian agrees that the additional policy and proposed new rule, providing for appropriate vegetation removal in significant natural areas, have merit.	Allow / Allow the requested addition of the policy and rule.	Reject	No
Royal Forest and Bird Protection Society	345.59	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Support	Supports the policy.	Retain INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.	Accept	No
Waka Kotahi	370.114	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Support	Support this policy as under the maintenance and repair definition it 'means any work or activity necessary to continue the operation or functioning of existing infrastructure.' Waka Kotahi consider this sufficient to cover off health and safety risks such as vegetation control to preserve sight lines.	Retain INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.	Accept	No
Waka Kotahi	370.115	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.	Accept	No

Director-General of Conservation	385.29	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Support	Supports proposed policy INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area).	Retain policy INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.	Accept	No
Wellington International Airport Ltd	406.145	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Oppose in part	Opposes INF-ECO-P33 [See paragraphs 4.49 to 4.54 of original submission for full reason]	Opposes INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) in part and seeks amendment.	Reject	No
Wellington International Airport Ltd	406.146	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Amend	Opposes INF-ECO-P33 [See paragraphs 4.49 to 4.54 of original submission for full reason]	Amend INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as follows: Provide for the operation, maintenance and repair of existing infrastructure within significant natural areas where the activity, including associated earthworks, not adversely affect the biodiversity values. it can be demonstrated that: <u>1. There is an operational need or functional need that means the infrastructure's location cannot be practicably avoided; and</u> <u>2. Any adverse effects on indigenous biodiversity values within a significant natural area are applied in accordance with ECO-P1.</u>	Reject	No
Meridian Energy Limited	FS101.52	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Oppose	Meridian considers Policy INF-ECO-P33 is appropriate and necessary, to provide for existing lawfully authorised infrastructure, so opposes its deletion. Meridian supports the proposed clause 2 (which requires adverse effects to be managed in accordance with Policy ECO-P1). The policy applies to existing infrastructure such that the locational considerations may not be relevant.	Amend / Amend provision to disallow requested deletion, but allow in part the requested amendments (clause 2).	Reject	No
Wellington International Airport Ltd	406.147	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Amend	Opposes INF-ECO-P33 [See paragraphs 4.49 to 4.54 of original submission for full reason]	Delete INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) in its entirety.	Reject	No
Meridian Energy Limited	FS101.53	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Oppose	Meridian considers Policy INF-ECO-P33 is appropriate and necessary, to provide for existing lawfully authorised infrastructure, so opposes its deletion. Meridian supports the proposed clause 2 (which requires adverse effects to be managed in accordance with Policy ECO-P1). The policy applies to existing infrastructure such that the locational considerations may not be relevant.	Amend / Amend provision to disallow requested deletion, but allow in part the requested amendments (clause 2).	Reject	No
KiwiRail Holdings Limited	408.65	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Support	Supports policy which provides for the operation, maintenance and repair of infrastructure within SNAs. KiwiRail note there are mapped Significant Natural Areas that include KiwiRail land. The SNAs as proposed, recognise established rail infrastructure and do not include existing structures or railway tracks but do cover KiwiRail land adjacent to infrastructure on the Johnsonville Line and at Hawkins Hill. KiwiRail therefore have an interest in these provisions.	Retain INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.	Accept	No

Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	99.50	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Oppose in part	INF-ECO-P34 incorrectly cross-refers to the effects management hierarchy in Policy ECO-P2. This needs to be amended to ECO-P1 where the hierarchy sits.	Amend Policy INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) so the cross-reference to the effects management hierarchy is ECO-P1.	Accept in part	Yes
Meridian Energy Limited	FS101.54	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Support	Meridian agrees the correct reference is to Policy P1.	Allow / Allow the requested amendment (replacing ECO-P2 with ECO-P1)	Accept in part	No
Powerco Limited	127.32	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Oppose in part	Considers that this policy incorrectly cross-refers to the effects management hierarchy in Policy ECO-P2 (Appropriate vegetation removal in significant natural areas). This needs to be amended to ECO-P1 where the hierarchy sits.	Amend Policy INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) as follows: Allow for upgrades to existing infrastructure and for new infrastructure within significant natural areas where it can be demonstrated that: 1. There is an operational need or functional need that means the infrastructure's location cannot be avoided; and 2. Any adverse effects on indigenous biodiversity values within a significant natural area are applied in accordance with <u>ECO-P1</u> . ECO-P2 .	Accept in part	Yes
Meridian Energy Limited	FS101.55	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Support	Meridian agrees the correct reference is to Policy P1.	Allow / Allow the requested amendment (replacing ECO-P2 with ECO-P1)	Accept in part	No
Royal Forest and Bird Protection Society	345.60	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Oppose in part	Supports the requirement that ECO P1 is met, although this should be expressed more clearly. We have made submissions about ECO-P1, and seek that those amendments are also given effect to via this policy. Opposes the inclusion of paragraph 1 in this policy, as it adds another standard that arguably will lessen the protections required to be given by ECO-P1. If it is to remain, we oppose the reference to operational need, as that encompasses a very broad range of considerations. We have sought that ECO P1 reference ECO P5. If that does not occur, ECO P5 will also need to be referenced in this policy. Notes that the reference to ECO-P2 in this policy should be ECO-P1.	Amend INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas): <u>Consider allowing</u> Allow for upgrades to existing infrastructure and for new infrastructure within significant natural areas <u>only</u> where it can be demonstrated that: 1. There is an operational need or functional need that means the infrastructure's location cannot be avoided; and 2. Any adverse effects on indigenous biodiversity values within a significant natural area are managed applied in accordance with <u>ECO P21 and ECO P5</u> .	Accept in part	Yes
Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	FS25.13	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Oppose	Operational need and functional need are relevant considerations to determine if infrastructure is appropriate insignificant natural areas, and accordingly should not be deleted from the policy.	Disallow	Accept in part	No

Powerco Limited	FS61.13	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Oppose	Operational need and functional need are relevant considerations to determine if infrastructure is appropriate insignificant natural areas, and accordingly should not be deleted from the policy.	Disallow	Accept in part	No
KiwiRail Holdings Limited	FS72.34	Part 2 / District-Wide Matters / Energy, Infrastructure, and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Oppose	<p>Considers it appropriate to include operational and functional needs within this policy. These terms are well defined in relation to infrastructure activities and KiwiRail seeks that the needs of infrastructure are recognised and provided for in policy.</p> <p>Considers the relief sought should be declined because it a) will not promote the sustainable management of the natural and physical resources in Wellington City, and is therefore contrary to, or inconsistent with, Part 2 and other provisions of the RMA and the Amendment Act; (b) is inconsistent with other relevant planning documents, including the Greater Wellington Regional Policy Statement and National Policy Statement for Urban Development 2020; (c) will not meet the reasonably foreseeable needs of future generations; (d) will not avoid, remedy or mitigate actual and potential adverse effects on the environment; (e) will not enable the social, economic and cultural wellbeing of people of Wellington City; and (f) is not the most appropriate way to achieve the objectives of the Proposed Plan in terms of section 32 of the RMA.</p>	Disallow	Accept in part	No
Meridian Energy Limited	FS101.57	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Support	Meridian agrees the correct reference is to Policies P1 and P5.	Allow / Allow the requested amendment (replacing ECO-P2 with ECO-P1 and ECO-P5)	Accept in part	Yes
Waka Kotahi	370.116	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) as notified.	Accept in part	No
Director-General of Conservation	385.30	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Support	Supports proposed policy INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas).	Retain policy INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) as notified.	Accept in part	No
Wellington International Airport Ltd	406.148	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Oppose	<p>Opposes INF-ECO-P34</p> <p>[See paragraphs 4.50 to 4.55 of original submission for full reason]</p>	Opposes INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas as follows) and seeks amendment.	Reject	No
Wellington International Airport Ltd	406.149	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Amend	<p>Opposes INF-ECO-P34</p> <p>[See paragraphs 4.50 to 4.55 of original submission for full reason]</p>	Delete INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas as follows) in its entirety.	Reject	No

Wellington International Airport Ltd	406.150	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Amend	Opposes INF-ECO-P34 [See paragraphs 4.50 to 4.55 of original submission for full reason]	Amend INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas as follows): Allow for upgrades to existing infrastructure and for new infrastructure within significant natural areas where it can be demonstrated that: 1. There is an operational need or functional need that means the infrastructure's location cannot be <u>practicably</u> avoided; and 2. Any adverse effects on indigenous biodiversity values within a significant natural area are applied in accordance with ECO-P2 <u>ECO-P1</u> .	Accept in Part	Yes
Meridian Energy Limited	FS101.56	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Support	Meridian agrees the correct reference is to Policy P1.	Allow / Allow the requested amendment (replacing ECO-P2 with ECO-P1)	Accept in part	Yes
KiwiRail Holdings Limited	408.66	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Support	Supports policy to allow for upgrades to and new infrastructure in SNAs.	Retain INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) as notified.	Accept in Part	No
Transpower New Zealand Limited	315.112	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P35	Amend	Considers that Transpower has existing assets within identified SNAs [see full submission for image supplied]. Transpower is required to undertake vegetation trimming/clearance necessary for the safe and efficient operation, maintenance, upgrading and development of the National Grid, including (but not limited to) trimming that may be required by the Electricity (Hazards from Trees) Regulations 2003. Related, is the operational requirement for clearance of vegetation on access tracks to enable Transpower to access the grid infrastructure to undertake its operation, maintenance and upgrade. Submitter considers the policy does not give effect to the NPS-ET. Considers the policy directive within INF-ECO-P35 that works "do not adversely affect the biodiversity values" does not give effect to the NPS-ET. Considers the policy is drafted such that all and any adverse effects are to be avoided. Considers that such a requirement is onerous given the policy relates to existing infrastructure which will often have safety requirements and obligations in respect of adjacent vegetation. Transpower seeks amendment to the policy to reflect the realities of maintaining the National Grid and ensuring safe and necessary vegetation clearance distances. (Option A) [Refer to original submission for full reason]	Amend policy INF-ECO-P35 (Operation, maintenance and repair of existing National Grid infrastructure within a significant natural area) as follows: Provide for the operation, maintenance, and repair <u>and minor upgrade of</u> existing transmission lines within significant natural areas where the activity, including associated earthworks, does not adversely affect the biodiversity values, while managing the adverse effects of these activities.	Accept in Part	Yes
Royal Forest and Bird Protection Society	345.61	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P35	Support	Supports the policy.	Retain INF-ECO-P35 (Operation, maintenance, and repair of existing National Grid Infrastructure with a significant natural area) as notified.	Reject	No

Transpower New Zealand Limited	FS29.24	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECOP35	Oppose	While Transpower supports the provision of a policy specific to the National Grid, in its submission Transpower seeks amendment to the policy to give effect to the NPSET and to ensure safe and necessary vegetation clearance distances.	Disallow / Seeks that submission is disallowed in part in so far as the relief sought is inconsistent with that sought in Transpower's submission.	Accept in Part	No
Waka Kotahi	370.117	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P35	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P35 (Operation, maintenance and repair of existing National Grid infrastructure within a significant natural area) as notified.	Reject	No
Director-General of Conservation	385.31	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P35	Support	Supports proposed policy INF-ECO-P35 (Operation, maintenance and repair of existing National Grid infrastructure within a significant natural area).	Retain policy INF-ECO-P35 (Operation, maintenance and repair of existing National Grid infrastructure within a significant natural area) as notified.	Reject	No
Transpower New Zealand Limited	315.113	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Oppose	<p>Considers that Transpower has existing assets within identified SNA's and is required to provide a reliable and efficient transmission network. The SNA's across the city are extensive and cover both the open space and rural environments. The intent of the NPS-ET and NESETA is to provide a comprehensive regime for the National Grid recognising its national significance. Of relevance to the upgrading of the National Grid are policies 1-6. Considers that, as currently drafted, Transpower has concerns INF-ECO-P36 does not give effect to the NPS-ET. The cross references to the ECO hierarchy policy 2 (noting this cross reference appears an error and it should be ECO-P1) does not give effect to the NPS-ET. While Transpower is not outright opposed to the cross reference to the ECO policies, it has reservations that a direct cross reference to general policies will not reflect the nuanced approach that is required in order to give effect to the NPS-ET. Furthermore the cross reference to the effects management hierarchy is not appropriate for all maintenance activities given the necessity of the works. Transpower has proposed an amended policy approach to give effect to the NPS-ET.</p> <p>[Refer to original submission for full reason]</p>	Opposes policy INF-ECO-P36 (Upgrading the National Grid within significant natural areas) and seeks amendment.	Reject	No

Transpower New Zealand Limited	315.114	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Amend	<p>Considers that Transpower has existing assets within identified SNA's and is required to provide a reliable and efficient transmission network. The SNA's across the city are extensive and cover both the open space and rural environments. The intent of the NPS-ET and NESETA is to provide a comprehensive regime for the National Grid recognising its national significance. Of relevance to the upgrading of the National Grid are policies 1-6. Considers that, as currently drafted, Transpower has concerns INF-ECO-P36 does not give effect to the NPS-ET. The cross references to the ECO hierarchy policy 2 (noting this cross reference appears an error and it should be ECO-P1) does not give effect to the NPS-ET. While Transpower is not outright opposed to the cross reference to the ECO policies, it has reservations that a direct cross reference to general policies will not reflect the nuanced approach that is required in order to give effect to the NPS-ET. Furthermore the cross reference to the effects management hierarchy is not appropriate for all maintenance activities given the necessity of the works. Transpower has proposed an amended policy approach to give effect to the NPS-ET.</p> <p>[Refer to original submission for full reason]</p>	<p>Amend policy INF-ECO-P36 (Upgrading the National Grid within significant natural areas) as follows:</p> <p>INF-ECO-P36 Upgrading the National Grid within significant natural areas</p> <p>Provide for upgrading of the National Grid within significant natural areas by applying the effects management hierarchy in ECO-P2.</p> <p><u>In providing for the upgrading of existing National Grid (NG)) infrastructure within significant natural areas:</u></p> <ol style="list-style-type: none"> <u>1. Seek to avoid adverse effects on biodiversity values</u> <u>2. When considering major upgrades, have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection;</u> <u>3. Recognise the constraints arising from the operational needs and functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects; and</u> <u>4. Recognise the potential benefits of upgrades to the National Grid to people and communities;</u> 	Accept in Part	Yes
Royal Forest and Bird Protection Society	345.62	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Support	Notes incorrect reference to ECO-P2, considers ECO-P5 should also be referenced.	<p>Amend INF-ECO-P36 (Upgrading the National Grid within significant natural areas):</p> <p>Consider providing Provide for upgrading of the National Grid within significant natural areas <u>only where it can be demonstrated that any adverse effects on indigenous biodiversity are managed in accordance with by applying the effects management hierarchy in ECO-P21 and ECO-P5.</u></p>	Reject	No
Transpower New Zealand Limited	FS29.25	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECOP36	Oppose	While Transpower supports the provision of a policy specific to the National Grid, in its submission Transpower seeks amendment to the policy to give effect to the NPSET and to ensure safe and necessary vegetation clearance distances.	Disallow / Seeks that submission is disallowed in part in so far as the relief sought is inconsistent with that sought in Transpower's submission.	Accept in Part	No
Waka Kotahi	370.118	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P36 (Upgrading the National Grid within significant natural areas) as notified.	Accept in Part	No
Director-General of Conservation	385.32	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Support	Supports proposed policy INF-ECO-P36 (Upgrading the National Grid within significant natural areas).	Retain policy INF-ECO-P36 (Upgrading the National Grid within significant natural areas) as notified.	Accept in Part	No

Transpower New Zealand Limited	315.115	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Oppose	The submitter does not oppose the identification of SNAs, but considers the policy approach has to be cognisant of the need to develop the National Grid and also give effect to the NPS-ET. Transpower proposes an amended policy approach specific to the National Grid [in general]. Considers that key to the approach is the recognition of the need to provide and enable the National Grid, whilst also providing a robust framework to manage effects. Specific to INF-ECO-P37, while Transpower accepts the policy does have regard to the route, site and method selection process, and operational needs, considers they apply in context of the policy chapeau to 'give priority to avoiding adverse effects'. Submitter queries how the term "give priority to avoiding adverse effects" would be implemented. Queries if this requires avoidance as the default position. Transpower's preference is for development within SNA's to be addressed in the specific National Grid development policy (within the INF chapter). Considers this would enable any new National Grid development to be considered in a comprehensive manner.	Delete INF-ECO-P37 (New development of National Grid within significant natural areas) in its entirety. [And add a new National Grid specific policy]	Accept in Part	Yes
Royal Forest and Bird Protection Society	345.63	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Support in part	Notes incorrect reference to ECO-P2. Supports direction to give priority to avoiding adverse effects. Considers this policy confusing, as it covers different and potentially conflicting standards. Considers it would be simpler, and still meet the direction provided by the NPSET require adherence to ECO-P1, which contains an inherent consideration of the extent to which effects have been avoided, remedied or mitigated. Notes it is also subject to part 2, including the requirement to protect significant indigenous biodiversity under s6(c).	Amend INF-ECO-P37 (New development of National Grid within significant natural areas): Give priority to avoiding adverse effects of the National Grid on significant natural areas by applying the effects management hierarchy in ECO-P21 when located within significant natural areas, by: 1. Having regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection and techniques and measures proposed; and 2. Considering the constraints arising from the operational needs	Reject	No
Transpower New Zealand Limited	FS29.26	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECOP37	Oppose	In its submission Transpower seeks deletion of reference to the National Grid within the rule given the NESETA prevails.	Disallow / Seeks that submission is disallowed in part in so far as the relief sought is inconsistent with that sought in Transpower's submission.	Accept in Part	No
Greater Wellington Regional Council	351.94	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Amend	Considers the wording of this policy is inconsistent with the 'avoid, minimise, remedy' direction of the effects management hierarchy in ECO-P1 and should be amended to be consistent.	Amend INF-ECO-P37 (New development of National Grid within significant natural areas) to reference the effects management hierarchy and ensure consistency with the 'avoid, minimise, remedy' direction in ECO-P1 (Protection of significant natural areas).	Reject	No
Transpower New Zealand Limited	FS29.3	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECOP37	Oppose	Oppose the submission in so far as it is inconsistent with the relief sought in the Transpower submission.	Disallow	Accept in Part	No
Waka Kotahi	370.119	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P37 (New development of National Grid within significant natural areas) as notified.	Accept in Part	No

Director-General of Conservation	385.33	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Support	Supports proposed policy INF-ECO-P37 (New development of National Grid within significant natural areas).	Retain policy INF-ECO-P37 (New development of National Grid within significant natural areas) as notified.	Accept in Part	No
Royal Forest and Bird Protection Society	345.64	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Oppose in part	Notes INF-ECO-S19 provides for cutting new tracks up to 2.5m wide in SNAs. Considers this is not appropriate as a permitted activity, and does not give effect to INF-ECO P33. Seeks either deletion of this activity from INF-ECO-S19, or amend this Permitted activity rule. Considers that new tracks should be a RD activity. Notes INF-ECO-S20 is not clear as to whether it applies to earthworks for the maintenance of existing tracks, or for new tracks. Considers that new tracks should not be a Permitted activity as this does not give effect to INF-ECO P33. Considers that new tracks should be clearly excluded from being a Permitted activity.	Amend INF-ECO-R41 (Operation, maintenance, repair, and removal of existing infrastructure within a significant natural area) to exclude new tracks from being a Permitted activity. Add new sub-rule making new tracks a Restricted Discretionary activity.	Reject	No
Royal Forest and Bird Protection Society	345.65	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Oppose in part	Considers new tracks (vegetation trimming, removal and earthworks) for operation, maintenance repair and removal should be included in this RD activity rule. Considers this rule should not apply in the coastal environment where there are policy 11 (NZCPS) matters present. Seeks to amend the matters of discretion as they are considered too narrow to provide for proper consideration of biodiversity values, and do not give effect to INF-ECO P33. Considers this approach is out of step with the rest of the plan, which generally provides for matters of discretion that refer back to the relevant policies. Corresponding amendments to the assessment criteria for ECO-INF-S19 and ECO-INF-S20 have also been sought.	Amend INF-ECO-R41 (Operation, maintenance, repair, and removal of existing infrastructure within a significant natural area): 2. Activity status: Restricted Discretionary Where: a. Compliance with any of the requirements of INF-ECO-R41.1 cannot be achieved; and <u>b. The significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> Matters of discretion are: 1. The matters in INF-ECO-P33 (or refer back to ECO P1) 2. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard.	Reject	No
Royal Forest and Bird Protection Society	345.66	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Amend	Seeks new rule to give effect to policy 11 of NZCPS.	Add new rule INF-ECO-R41.3 (Operation, maintenance, repair, and removal of existing infrastructure within a significant natural area): 3. Activity status: Non Complying Where: a. Compliance with the requirements of INF-ECO R41.1 cannot be achieved; and b. The significant natural area includes matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment. Section 88 information requirements for applications: Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15: 1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and 2. Demonstrating that ECO P5 (or refer to the new policy 11 policy sought above) has first been met, and the effects management hierarchy at ECO-P1 has been applied to other adverse effects.	Reject	No

Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	FS25.14	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Oppose	Non-complying activity status for operation, maintenance, repair and removal of infrastructure from significant natural areas not meeting permitted activity standard is not supported. The current restricted discretionary activity status allows necessary work to be considered on its merits and level of effects.	Disallow	Accept	No
Powerco Limited	FS61.14	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P41	Oppose	Non-complying activity status for operation, maintenance, repair and removal of infrastructure from significant natural areas not meeting permitted activity standard is not supported. The current restricted discretionary activity status allows necessary work to be considered on its merits and level of effects.	Disallow	Accept	No
KiwiRail Holdings Limited	FS72.35	Part 2 / District-Wide Matters / Energy, Infrastructure, and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Oppose	Considers the restricted discretionary status is acceptable where requirements of INF-ECO-R41.1 cannot be met. Considers the relief sought should be declined because it a) will not promote the sustainable management of the natural and physical resources in Wellington City, and is therefore contrary to, or inconsistent with, Part 2 and other provisions of the RMA and the Amendment Act; (b) is inconsistent with other relevant planning documents, including the Greater Wellington Regional Policy Statement and National Policy Statement for Urban Development 2020; (c) will not meet the reasonably foreseeable needs of future generations; (d) will not avoid, remedy or mitigate actual and potential adverse effects on the environment; (e) will not enable the social, economic and cultural wellbeing of people of Wellington City; and (f) is not the most appropriate way to achieve the objectives of the Proposed Plan in terms of section 32 of the RMA.	Disallow	Accept	No
Meridian Energy Limited	FS101.58	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Oppose	Meridian opposes the requested non-complying activity status. The rule is not necessary because, within SNAs, most infrastructure will require a consent to establish and the terms of the consent will manage effects on the values of the SNA of operation, maintenance and repair. Removal of infrastructure does not warrant noncomplying activity status. It is also relevant that this activity status has not been retained in the Natural and Built Environments Bill.	Disallow	Accept	No
Waka Kotahi	370.120	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-R41 (Operation, maintenance, repair and removal of existing infrastructure within a significant natural area) as notified.	Accept	No
KiwiRail Holdings Limited	408.67	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Support	Supports the ability to operate, maintain, repair and remove existing infrastructure within a SNA as a permitted activity, subject to standards.	Retain INF-ECO-R41 (Operation, maintenance, repair and removal of existing infrastructure within a significant natural area) as notified.	Accept	No

Royal Forest and Bird Protection Society	345.67	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R42	Oppose in part	Considers it is unclear why the matters of discretion refer to the standards, as no standards appear to be relevant to the activity. Supports the matters of discretion referring back to INF-ECO-P33. Seeks that ECO-P1 is also referred to. If exemption suggested is accepted, then seeks that the rule become a Non-complying activity status for upgrading existing infrastructure.	Amend INF-ECO-R42 (Upgrades to existing infrastructure within a significant natural area): 1. Activity status: Restricted Discretionary Matters of discretion are: 1. The matters in INF-ECO-P33 and ECO-P1; and 1. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard. <u>Exemption: The significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> Add new rule INF-ECO-R42.2: <u>2. Activity status: Non Complying</u> <u>Where:</u> <u>1. The significant natural area includes matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> <u>Section 88 information requirements for applications:</u> <u>Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15:</u> <u>1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and</u> <u>2. Demonstrating that ECO P5 (or refer to the new policy 11 policy</u>	Accept in part	Yes
Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	FS25.15	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R42	Oppose	Non-complying activity status for upgrading of existing infrastructure in the significant natural areas in the coastal environment (where subject to Policy 11 of the NZCPS) is not supported. This may capture areas subject to Policy 11(b) where the policy directive in the NZCPS is avoid significant adverse effects and contemplates some level of impact can be considered	Disallow	Reject	No
Powerco Limited	FS61.15	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P42	Oppose	Non-complying activity status for upgrading of existing infrastructure in the significant natural areas in the coastal environment (where subject to Policy 11 of the NZCPS) is not supported. This may capture areas subject to Policy 11(b) where the policy directive in the NZCPS is avoid significant adverse effects and contemplates some level of impact can be considered.	Disallow	Reject	No

KiwiRail Holdings Limited	FS72.36	Part 2 / District-Wide Matters / Energy, Infrastructure, and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R42	Oppose	<p>Considers the restricted discretionary status is acceptable for upgrades to existing infrastructure.</p> <p>Considers the relief sought should be declined because it a) will not promote the sustainable management of the natural and physical resources in Wellington City, and is therefore contrary to, or inconsistent with, Part 2 and other provisions of the RMA and the Amendment Act; (b) is inconsistent with other relevant planning documents, including the Greater Wellington Regional Policy Statement and National Policy Statement for Urban Development 2020; (c) will not meet the reasonably foreseeable needs of future generations; (d) will not avoid, remedy or mitigate actual and potential adverse effects on the environment; (e) will not enable the social, economic and cultural wellbeing of people of Wellington City; and (f) is not the most appropriate way to achieve the objectives of the Proposed Plan in terms of section 32 of the RMA.</p>	Disallow	Reject	No
Meridian Energy Limited	FS101.59	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R42	Oppose	Meridian agrees that reference to Policy ECOP1 is appropriate but opposes the requested non-complying activity status.	<p>Amend / Allow the correction of the reference to ECO-P1.</p> <p>Disallow the requested exemption and the proposed new non-complying activity rule.</p>	Accept in part	Yes
Waka Kotahi	370.121	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R42	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-R42 (Upgrades to existing infrastructure within a significant natural area) as notified.	Accept in part	No
KiwiRail Holdings Limited	408.68	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R42	Support	Supports the ability to upgrade existing infrastructure as a restricted discretionary activity and construct new infrastructure as a discretionary activity within a SNA.	Retain INF-ECO-R42 (Upgrades to existing infrastructure within a significant natural area) as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.68	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R43	Oppose	Considers this rule should have a non-complying activity status to give effect to S6(c) policy 11 NZCPS.	<p>Amend INF-ECO-R43 (New infrastructure within a significant natural area):</p> <p>1. Activity status: Discretionary <u>Non-complying</u></p>	Reject	No
Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	FS25.16	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R43	Oppose	Non-complying activity status for new infrastructure in significant natural areas is not supported. This may be unavoidable in some circumstances due to functional need and operational need, and does not take into account the scale of any work and associated effects. It is important that infrastructure has a consent pathway in appropriate circumstances.	Disallow	Accept	No
Powerco Limited	FS61.16	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P43	Oppose	Non-complying activity status for new infrastructure in significant natural areas is not supported. This may be unavoidable in some circumstances due to functional need and operational need, and does not take into account the scale of any work and associated effects. It is important that infrastructure has a consent pathway in appropriate circumstances.	Disallow	Accept	No

KiwiRail Holdings Limited	FS72.37	Part 2 / District-Wide Matters / Energy, Infrastructure, and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R43	Oppose	Considers the discretionary status is acceptable for new infrastructure. Considers the relief sought should be declined because it a) will not promote the sustainable management of the natural and physical resources in Wellington City, and is therefore contrary to, or inconsistent with, Part 2 and other provisions of the RMA and the Amendment Act; (b) is inconsistent with other relevant planning documents, including the Greater Wellington Regional Policy Statement and National Policy Statement for Urban Development 2020; (c) will not meet the reasonably foreseeable needs of future generations; (d) will not avoid, remedy or mitigate actual and potential adverse effects on the environment; (e) will not enable the social, economic and cultural wellbeing of people of Wellington City; and (f) is not the most appropriate way to achieve the objectives of the Proposed Plan in terms of section 32 of the RMA.	Disallow		
Meridian Energy Limited	FS101.60	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R43	Oppose	Meridian opposes the requested non-complying activity status. The submission does not provide reasoning that supports non-complying activity status in terms of the requirements of s. 32AA of the RMA.	Disallow		
Waka Kotahi	370.122	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R43	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-R43 (New infrastructure within a significant natural area) as notified.	Accept	No
KiwiRail Holdings Limited	408.69	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R43	Support	Supports the ability to upgrade existing infrastructure as a restricted discretionary activity and construct new infrastructure as a discretionary activity within a SNA.	Retain INF-ECO-R43 (New infrastructure within a significant natural area) as notified.	Accept	No

Transpower New Zealand Limited	315.116	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Oppose	<p>Considers that, specific to the National Grid, the NESETA manages the trimming, felling and removal of vegetation and earthworks, with the activity status under the NESETA determined by the provisions in the PDP. The NESETA provides for earthworks and trimming, felling or removal of any vegetation as permitted activities subject to conditions. Considers that the default activity status of Restricted discretionary under clause 3 does not reflect that provided under regulation 34 of the NESETA. Given the NESETA prevails, Transpower considers clause 1 of Rule R44 is not required as the control of earthworks within an SNA is managed under the NESETA. With respect to vegetation works, under Regulation 30 of the NESETA, resource consent is required under Regulation 31 (for a controlled activity) or Regulation 32 for a restricted discretionary activity) if:</p> <p>A. A rule prohibits or restricts the works (Reg 30(2)(a)); or B. The vegetation is in a "natural area" (a term defined in NESETA) (Reg 30(2)(b). It is noted the standards within INF-ECO-S19 do not reflect that in the NESETA and therefore Transpower does not support them applying to the National Grid. The purpose of the NESETA is to provide a comprehensive, nationally consistent framework for existing National Grid Assets. Transpower opposes the imposition of rules to manage existing assets, noting those provided in Rule R44 do not reflect the NESETA. Considers the potential is for confusion over plan interpretation and implementation. [Refer to original submission for full reason]</p>	Opposes reference to the National Grid in INF-ECO-R44 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area).	Accept in Part	No
Transpower New Zealand Limited	315.117	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Amend	<p>Considers that, specific to the National Grid, the NESETA manages the trimming, felling and removal of vegetation and earthworks, with the activity status under the NESETA determined by the provisions in the PDP. The NESETA provides for earthworks and trimming, felling or removal of any vegetation as permitted activities subject to conditions. Considers that the default activity status of Restricted discretionary under clause 3 does not reflect that provided under regulation 34 of the NESETA. Given the NESETA prevails, Transpower considers clause 1 of Rule R44 is not required as the control of earthworks within an SNA is managed under the NESETA. With respect to vegetation works, under Regulation 30 of the NESETA, resource consent is required under Regulation 31 (for a controlled activity) or Regulation 32 for a restricted discretionary activity) if:</p> <p>A. A rule prohibits or restricts the works (Reg 30(2)(a)); or B. The vegetation is in a "natural area" (a term defined in NESETA) (Reg 30(2)(b). It is noted the standards within INF-ECO-S19 do not reflect that in the NESETA and therefore Transpower does not support them applying to the National Grid. The purpose of the NESETA is to provide a comprehensive, nationally consistent framework for existing National Grid Assets. Transpower opposes the imposition of rules to manage existing assets, noting those provided in Rule R44 do not reflect the NESETA. Considers the potential is for confusion over plan interpretation and implementation. [Refer to original submission for full reason]</p>	Amend INF-ECO-R44 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area) by deleting reference to the National Grid from the rule.	Accept in Part	Yes

Royal Forest and Bird Protection Society	345.69	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Oppose in part	INF-ECO-S19 provides for cutting new tracks up to 2.5m wide in SNAs, which is not considered appropriate as a permitted activity, and does not give effect to INF-ECO P33. Seeks to either delete this activity from INF-ECO-S19, or amend this Permitted activity rule. Considers new tracks should be RD activity. INF-ECO-S20 is not clear as to whether it applies to earthworks for the maintenance of existing tracks, or for new tracks - considers new tracks should not be Permitted as this does not give effect to INF-ECO P33. Considers new tracks should be clearly excluded from this Permitted activity rule.	Amend INF-ECO-R44 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area) to exclude new tracks from being a Permitted activity. Add new sub-rule making new tracks a Restricted Discretionary activity.	Reject	No
Transpower New Zealand Limited	FS29.27	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECOR44	Oppose	In its submission Transpower seeks deletion of reference to the National Grid within the rule given the NESETA prevails.	Disallow / Seeks that submission is disallowed in part in so far as the relief sought is inconsistent with that sought in Transpower's submission.	Accept in Part	No
Royal Forest and Bird Protection Society	345.70	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Oppose in part	Considers that if this activity is to remain controlled, it should have some parameters around it, for example how close the vegetation removal needs to be to the lines to still come within the controlled rule.	Add additional matters of control to INF-ECO-R44.2 to include additional parameters, e.g. how close vegetation removal can be to the lines to come within the Controlled activity status.	Reject	No
Royal Forest and Bird Protection Society	345.71	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Oppose in part	INF-ECO-R44.3: Supports the matters of discretion referring back to INF-ECO-P33, and also seeks that ECO-P1 is referred to. Considers rule should include an exemption for SNA's not including matters listed in policy 11 of NZCPS. If exemption suggested is accepted, then seeks that the rule become a Non-complying activity status activities in SNA's with policy 11 matters.	Amend INF-ECO-R44 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area): 3. Activity status: Restricted Discretionary Where: a. Compliance with the requirements of INF-ECO-R44.1 or INF-ECO-R44.2 cannot be achieved. Matters of discretion are: 1. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard; and 2. The matters in INF-ECO-P33 and <u>ECO-P1</u> . <u>Exemption: The significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> Add new sub-rule INF-ECO-R44.4: 4. Activity status: Non Complying Where: 1. The significant natural area includes matters identified in <u>Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> <u>Section 88 information requirements for applications: Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15:</u>	Reject	No

Transpower New Zealand Limited	FS29.28	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Oppose	In its submission Transpower seeks deletion of reference to the National Grid within the rule given the NESETA prevails.	Disallow		
Transpower New Zealand Limited	315.118	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R45	Oppose	Considers that, specific to the National Grid, the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ("NESETA") provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid, and on this basis, INF-ECO-R45 for existing National Grid structures captured by the NESETA is of limited relevance to Transpower in respect of rule application. It is noted the NESETA provides a Discretionary activity status under Regulations 39 of the NESETA for those activities subject to the NESETA but not otherwise captured under other regulations in the NESETA. The purpose of the NESETA is to provide a comprehensive, nationally consistent framework for existing National Grid Assets. Transpower opposes the imposition of rules to manage existing assets and instead seeks reliance on the NESETA.	Delete Rule INF-ECO-R45 (Upgrading of existing National Grid (NG) infrastructure within a significant natural area) in its entirety.		
Royal Forest and Bird Protection Society	345.72	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R45	Support in part	Supports matters of discretion referring to INF-ECO-P36 subject to the submission point made on that policy. Seeks that ECO-P1 also be referred to. If exemption suggested is accepted, then seeks that the rule become a Non-complying activity status for upgrading existing infrastructure.	Amend INF-ECO-R45 (Upgrading of existing National Grid (NG) infrastructure within a significant natural area): 1. Activity status: Restricted Discretionary Matters of discretion are: 1. The matters in INF-ECO-P36 and <u>ECO-P1</u> . <u>Exemption: The significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> Add new sub-rule: <u>2. Activity status: Non-complying</u> <u>Where:</u> <u>1. The significant natural area includes matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> <u>Section 88 information requirements for applications:</u> <u>Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15:</u> <u>1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and</u> <u>2. Demonstrating that ECO P5 (or refer to the new policy 11 policy sought above) has first been met, and the effects management hierarchy at ECO-P1 has been applied to other adverse effects.</u>		
Transpower New Zealand Limited	FS29.29	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R45	Oppose	In its submission Transpower seeks deletion of reference to the National Grid within the rule given the NESETA prevails.	Disallow		

Royal Forest and Bird Protection Society	345.73	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R46	Support in part	Supports the matters of discretion referring back to INF-ECO-P39, subject to amendments sought on that policy. Seek that ECO-P1 is also referred to. Should include exemption for activities in SNAs not containing any policy 11 matters. Seeks to add subsequent Non-complying activity status rule for activities in breach of this exemption.	Amend INF-ECO-R46 (Upgrading existing gas transmission pipeline corridor within a significant natural area): 1. Activity status: Restricted Discretionary Where: a. The infrastructure is located underground; or b. The infrastructure is located within an existing road reserve. <u>Exemption: he significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> Matters of discretion are: The matters in INF-ECO-P36 <u>and ECO-P1.</u> <u>Add new sub-rule INF-ECO-R46.X:</u> <u>Activity status: Non Complying</u> <u>Where:</u> <u>1. The significant natural area includes matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> <u>Section 88 information requirements for applications:</u> <u>Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15:</u> <u>1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and</u> <u>2. Demonstrating that ECO P5 (or refer to the new policy 11 policy sought above) has first been met, and the effects management</u>	Reject	No
Royal Forest and Bird Protection Society	345.74	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R46	Oppose in part	Considers the activity should be non-complying.	Amend INF-ECO-R46 (Upgrading existing gas transmission pipeline corridor within a significant natural area): 2. Activity status: Discretionary <u>Non-complying</u> Where: Compliance with any of the requirements of INF-ECO-R46.1 cannot be achieved.	Reject	No
Transpower New Zealand Limited	315.119	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R47	Support	Considers the activity status and associated policies provide an appropriate framework in which to manage the National Grid.	Retain INF-ECO-R47 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area) as notified.	Accept in Part	No
Royal Forest and Bird Protection Society	345.75	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R47	Oppose in part	Considers this rule should have a non-complying activity status.	Amend INF-ECO-R47 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area): 1. Activity status: Discretionary <u>Non-complying</u>	Reject	No
Transpower New Zealand Limited	FS29.30	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R47	Oppose	Transpower supports the discretionary activity status. The activity status and associated policies provide an appropriate framework in which to manage the National Grid, and a non-complying activity status would not give effect to the NPSET (particularly Policies 2, 3 and 8).	Disallow	Accept in Part	No

Fire and Emergency New Zealand	273.42	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Support in part	Considers that a new assessment matter should be added in order to ensure that fire risk mitigation is taken into account when assessing applications to trim or remove indigenous vegetation in areas subject to high fire risk.	Amend INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area), with amendment.	Reject	No
Fire and Emergency New Zealand	273.43	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Amend	Considers that a new assessment matter should be added in order to ensure that fire risk mitigation is taken into account when assessing applications to trim or remove indigenous vegetation in areas subject to high fire risk.	Amend INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) as follows: Assessment criteria: ... <u>3. The degree to which the trimming or removal of affected vegetation will provide for the health and safety of people, property, and the environment through the management of fire risk.</u>	Reject	No
Royal Forest and Bird Protection Society	345.76	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Oppose in part	Considers the width in paragraph 1 should be limited to 2m to accommodate an existing track. Opposes new tracks being a Permitted activity. Replace assessment criteria with that listed under ECO-S1 to give effect to INF-ECO-P33.	Amend INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area): 1. Trimming or removal of indigenous vegetation or trees within a significant natural area must be limited to 2m within the footprint of existing infrastructure, access tracks or fences to accommodate an existing track. Assessment criteria: 1. Operational or functional needs of infrastructure; and 2. The effect of the activity and removal on the identified biodiversity values of the significant natural area and the measures taken to avoid, minimise or remedy the effects and where relevant the ability to offset biodiversity impacts. <u>1. The extent to which the trimming or removal of indigenous vegetation limits the loss, damage or disruption to the ecological processes, functions and integrity of the significant natural area; and</u> <u>2. The effect of the vegetation removal on the identified biodiversity values.</u>	Reject	No
Transpower New Zealand Limited	FS29.31	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECOS19	Oppose	On the basis INF-ECO-R44 is to be amended so it does not apply to the National Grid, Standard S19 will not be applicable to the National Grid. If the intent is for S19 to apply to the National Grid Transpower opposes its application as the NESETA manages vegetation works for existing National Grid infrastructure and the provision of a standard to apply to the National Grid adds unnecessary confusion and interpretation issues.	Disallow / Seeks that submission is disallowed in part in so far as the relief sought is inconsistent with that sought in Transpower's submission.	Accept in Part	No
Meridian Energy Limited	FS101.61	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Oppose	Considers that the subject matter of the requested amendments is addressed already by the wording of the standard as notified. The requested amendments are unnecessary.	Disallow	Accept in Part	No

Greater Wellington Regional Council	351.95	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Amend	Considers that Policy 24 of the RPS directs councils to protect indigenous ecosystems and habitats with significant indigenous biodiversity values. The 'identified' qualifier limits the consideration of effects to those values identified within the SNA at the time of plan notification. The values of most SNAs have been identified only at a high-level, and often only through desktop analysis. The assessment required to identify the scope of effects may identify additional values and this should be part of the consideration of effects at the time consent is applied for.	Seeks to amend wording to remove 'identified' before 'significant biodiversity values' when referring to adverse effects caused by activities or maintenance of biodiversity values.	Reject	No
Meridian Energy Limited	FS101.62	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Oppose	Considers that the values of concern should be those that have been identified as the reason for identification of the area as significant. Broadening the consideration to all values, as proposed by the submission, will create uncertainty and potential unwarranted costs for applicants for consents.	Disallow / Disallow the requested deletion of 'identified'.	Accept in Part	No
Wellington City Council Environmental Reference Group	FS112.6	Part 2 /Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity /INF-ECO-S19	Support	Support the proposal from GWRC to remove 'identified' before 'significant biodiversity values'. We agree with them that the assessment required to identify the scope of effects may identify additional values, and this should be part of the consideration of effects at the time consent is applied for.	Allow	Accept in Part	No
Greater Wellington Regional Council	351.96	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Amend	Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes. Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the "significant habitats of indigenous fauna" not the significant indigenous habitats of indigenous fauna.	Seeks to amend standard (where relevant) to change 'indigenous vegetation' to 'vegetation'.	Accept	Yes
Wellington Electricity Lines Limited	355.47	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Support	Supports INF-ECO-S19 for its aspirations to protect and enhance the City's SNA. Notwithstanding this support, it is considered appropriate to enable the continued safe and efficient operation of electricity lines through the provisions of the Electricity (Hazards from Trees) Regulations 2003 or the Telecommunications Act 2001.	Retain INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) as notified.	Accept	No
Waka Kotahi	370.123	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) as notified.	Accept	No
KiwiRail Holdings Limited	408.70	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Amend	Supports a standard for trimming or removing indigenous vegetation within a SNA. However, KiwiRail request the limit for this be increased to 5m within the footprint of existing infrastructure. KiwiRail typically clear vegetation within 5m of railway tracks as part of routine corridor maintenance throughout the country. This is the optimum clearance distance to ensure the rail network can operate safely and efficiently.	Amend INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) as follows: 1. Trimming or removal of indigenous vegetation or trees within a significant natural area must be limited to <u>5m</u> 2m within the footprint of existing infrastructure, access tracks or fences.	Accept in part	Yes

Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	99.51	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Oppose	<p>INF-ECO-S20 should be amended to at least provide a nominal allowance for other infrastructure that may require some localised earthworks in significant natural areas (e.g. for maintenance and upgrading).</p> <p>The provision provides for 50m3 of earthworks per transmission line support structure as a permitted activity and is otherwise consistent with the Resource Management (National Environmental Standards for Electricity Transmission Line Activities) Regulations 2009.</p> <p>The Auckland Unitary Plan for example provides for 5m3 of earthworks in significant natural areas for infrastructure works.</p>	<p>Amend INF-ECO-S20 (Earthworks within a significant natural area) as follows:</p> <p>1. Earthworks within a significant natural area must not exceed:</p> <p>a. More than 50m3 per transmission line support structure; or</p> <p><u>b. More than 5m3 for other infrastructure; or</u></p> <p>b. c. 100m3 per access track.</p>	Accept in part	Yes
Wellington Electricity Lines Limited (WELL)	FS27.2	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Support	<p>WELL support this submission point to the extent that a permitted earthworks quantum should be provided for infrastructure located within SNAs. Similar to the submitter, WELL own and operate linier infrastructure that, through functional need, traverse SNAs. So as to enable the continued operation and maintenance of such infrastructure, a permitted activity standard for soil disturbing activities is considered appropriate in the PDP. WELL note that a 50m3 quantum has been sought for transmission line support structures; however, a 5m3 volume for pole structures is also supported as per the submission point.</p>	Allow	Accept in Part	Yes
Powerco Limited	127.33	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Oppose	<p>Considers that whilst this is consistent with the Resource Management (National Environmental Standards for Electricity Transmission Line Activities) Regulations 2009, there should be at least a nominal allowance for other infrastructure that may require some localised earthworks in significant natural areas (e.g. for maintenance and upgrading). The Auckland Unitary Plan for example provides for 5m3 of earthworks in significant natural areas for infrastructure works.</p>	<p>Amend standard INF-ECO-S20 (Earthworks within a significant natural area) as follows:</p> <p>1. Earthworks within a significant natural area must not exceed:</p> <p>a. More than 50m3 per transmission line support structure; or</p> <p><u>b. More than 5m3 for other infrastructure; or</u></p> <p>b. c. 100m3 per access track.</p>	Accept in part	Yes
Wellington Electricity Lines Limited (WELL)	FS27.14	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Support	<p>WELL support this submission point to the extent that a permitted earthworks quantum should be provided for infrastructure located within SNAs. Similar to the submitter, WELL own and operate linear infrastructure that, through functional need, traverse or are located within SNAs. So as to enable the continued operation and maintenance of such infrastructure, a permitted activity standard for soil disturbing activities is considered appropriate in the PDP. WELL note that a 50m3 quantum has been sought for transmission line support structures; however, a 5m3 volume for pole structures is also supported as per the submission point.</p>	Allow	Accept in Part	Yes

Royal Forest and Bird Protection Society	345.77	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Oppose in part	Considers that this should be limited to maintenance of existing tracks if it is to be a Permitted activity. Replace assessment criteria with that listed under ECO-S1 to give effect to INF-ECO-P33.	Amend INF-ECO-S20 (Earthworks within a significant natural area): 1. Earthworks within a significant natural area must be limited to maintenance of existing tracks. not exceed: More than 50m3 per transmission line support structure; or 100m3 per access track. Assessment criteria: 1. Operational or functional needs of infrastructure; and 2. The effect of the activity and removal on the identified biodiversity values of the significant natural area and the measures taken to avoid, minimise or remedy the effects and where relevant the ability to offset biodiversity impacts. <u>1. The extent to which the earthworks limits the loss, damage or disruption to the ecological processes, functions and integrity of the significant natural area; and</u> <u>2. The effect of the earthworks on the identified biodiversity values.</u>	Accept in part	Yes
Transpower New Zealand Limited	FS29.32	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECOS20	Oppose	On the basis INF-ECO-R44 is to be amended so it does not apply to the National Grid, Standard S20 will not be applicable to the National Grid. If the intent is for S20 to apply to the National Grid Transpower opposes its application as it duplicates the NESETA and adds unnecessary confusion and interpretation issues.	Disallow / Seeks that submission is disallowed in part in so far as the relief sought is inconsistent with that sought in Transpower's submission.	Accept in Part	No
KiwiRail Holdings Limited	FS72.38	Part 2 / District-Wide Matters / Energy, Infrastructure, and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Oppose	Considers that it is appropriate to provide for earthworks as a permitted activity subject to standards and this shouldn't be limited to access tracks only. KiwiRail also seeks the retention of the assessment criteria as proposed which recognises the operational or functional needs of infrastructure. Considers the relief sought should be declined because it a) will not promote the sustainable management of the natural and physical resources in Wellington City, and is therefore contrary to, or inconsistent with, Part 2 and other provisions of the RMA and the Amendment Act; (b) is inconsistent with other relevant planning documents, including the Greater Wellington Regional Policy Statement and National Policy Statement for Urban Development 2020; (c) will not meet the reasonably foreseeable needs of future generations; (d) will not avoid, remedy or mitigate actual and potential adverse effects on the environment; (e) will not enable the social, economic and cultural wellbeing of people of Wellington City; and (f) is not the most appropriate way to achieve the objectives of the Proposed Plan in terms of section 32 of the RMA.	Disallow	Accept in Part	No
Meridian Energy Limited	FS101.63	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Oppose	Considers that the standards are very restrictive, limiting the potential for adverse effects to minor, and ensuring that earthworks with the potential for adverse effects more than minor will require consent. The requested amendments are not necessary.	Disallow	Accept in Part	No

Greater Wellington Regional Council	351.97	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Amend	Considers that Policy 24 of the RPS directs councils to protect indigenous ecosystems and habitats with significant indigenous biodiversity values. The 'identified' qualifier limits the consideration of effects to those values identified within the SNA at the time of plan notification. The values of most SNAs have been identified only at a high-level, and often only through desktop analysis. The assessment required to identify the scope of effects may identify additional values and this should be part of the consideration of effects at the time consent is applied for.	Seeks to amend wording to remove 'identified' before 'significant biodiversity values' when referring to adverse effects caused by activities or maintenance of biodiversity values.	Accept	yes
Meridian Energy Limited	FS101.64	Part 2 / Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Oppose	Considers that the values of concern should be those that have been identified for the SNA as the reason why the area is significant.	Disallow / Disallow the requested deletion of 'identified'.	Reject	no
Wellington City Council Environmental Reference Group	FS112.7	Part 2 /Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity /INF-ECO-S20	Support	Support the proposal from GWRC to remove 'identified' before 'significant biodiversity values'. Agree with them that the assessment required to identify the scope of effects may identify additional values and this should be part of the consideration of effects at the time consent is applied for.	Allow	accept	yes
Wellington Electricity Lines Limited	355.48	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Support in part	Supports INF-ECO-S20 as it provides stricter earthworks parameters for infrastructure within a demonstrable SNA. Considers that sub-clause b should be amended so as not to only apply to 'transmission'. [Submitter refers to sub-clause b, but requests amendment in sub-clause a]	Retain INF-ECO-S20 (Earthworks within a significant natural area) with amendment.	Accept in part	No
Wellington Electricity Lines Limited	355.49	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Amend	Considers that INF-ECO-S20 should be amended so sub-clause a does not only apply to 'transmission'. [Submitter refers to sub-clause b, but requests amendment in sub-clause a]	Amend INF-ECO-S20 (Earthworks within a significant natural area) as follows: 1. Earthworks within a significant natural area must not exceed: a. More than 50m ³ per transmission electricity line support structure; or b. 100m ³ per access track.	Accept in part	No
Waka Kotahi	370.124	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-S20 (Earthworks within a significant natural area) as notified.	Accept in part	No
KiwiRail Holdings Limited	408.71	Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Support	Supports a standard for earthworks within a SNA, noting 100m ³ per access track is permitted by this standard.	Retain INF-ECO-S20 (Earthworks within a significant natural area) as notified.	Accept in part	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Royal Forest and Bird Protection Society	345.412	Schedules Subpart / Schedules / SCHED9 – Indigenous Tree Sizes	Oppose in part	Seeks reinstatement of SCHED 9 – Urban Environment Allotments that was included in the draft plan as at 20 April 2022, so that all areas of significant biodiversity in residential areas are identified and listed appropriately in the plan, to meet the requirements of s6(c) and s76.	Reinstate SCHED9 - Urban Environment Allotments from the Draft District Plan.	Reject	No
Kāinga Ora – Homes and Communities	FS89.159	Part 4 / Schedules Subpart / Schedules / SCHED9 – Indigenous Tree Sizes	Oppose	Kāinga Ora opposes amendments as this may impact on residential intensification outcomes.	Disallow	Accept	No
VicLabour	414.61	Schedules Subpart / Schedules / SCHED9 – Indigenous Tree Sizes	Amend	<p>Considers Significant Natural Areas are important in order to protect our environment and native plantlife.</p> <p>Considers that while the city is built denser, the environment and our wildlife should be protected.</p> <p>Considers that it is ironic that the argument for being anti-density is to protect the ‘character’ of our housing but yet there is no consideration for the ‘character’ of our nature, which is arguably much harder to restore than the character amenity gained from what the Council deems as character housing.</p>	Seeks that significant natural areas provisions apply to residentially zoned sites.	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Richard Herbert	360.3	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that SNAs should be reinstated on residential zones as originally proposed in earlier drafts of the Proposed District Plan, and prior to the Councillor Amendment to remove SNAs from Residential zones in June 2022. SNAs on Medium Residential Zones are supported. [Refer to original submission for full reason]	Reinstate Significant Natural Areas for Medium Density Residential Zones.	Reject	No
Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.16	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that protection of the biodiversity and ecology is important. These SNA's risk encroachment upon and destruction if not specifically protected given the planned development of the site, shows an urban road being built across an area marked SNA.	Seeks absolute protection of the Significant Natural Areas present at 395 Middleton Road.	Accept	No
Steve West	2.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	[Refer to original submission for full reason, including attachment].	[Refer to original submission for full reason, including attachment].	Accept in part	No
Steve West	2.3	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	[Refer to original submission for full reason, including attachment].	Seeks that if Significant Natural Areas are to apply to private land, incentives should be offered to compensate for loss of land value, to avoid landowners either removing natives, or reducing their environmental efforts to protect that bush. Providing incentives for new planting of natives so as to avoid a reduction in food sources for native birds and indigenous biodiversity.	Accept in part	No
Steve West	2.4	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Considers that the SNA rules are unworkable and have resulted in owners pre-emptively removing vegetation before the plan was notified. Because they are generic they do not suit urban land which have unique characteristics on each site, such as views, slopes and development potential.	Seeks that the Council work with private landowners to develop rules unique to specific properties rather than blanket rules.	Reject	No
Steve West	2.5	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Considers that SNAs on private urban land affect a large number of landowners but contribute little total area of vegetation. This creates increased work for Council staff and challenges to intensify housing within urban boundaries as some of the undeveloped city land will include native bush.	Supports that Significant Natural Areas do not apply to private residential land. [Inferred decision requested]	Accept	No
Steve West	2.6	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that SNA criteria should be clarified so that it is more representative of Wellington's biodiversity. Much vegetation that is being identified as significant are common native species. [Refer to original submission for full reason] Considers that the criteria being used by WCC for assessing for SNAs are broad with large areas of commonly found bush being captured by the policy settings as a result. [Refer to original submission for full reason]	Seeks that the Council have set its own specific criteria, rather than using those set by the Greater Wellington Regional Council, to reflect Wellington's natural and built-up environment.	Accept in part	No
Steve West	2.7	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Not specified	Considers that the rules create significant legal risk for landowners if they misunderstand those rules, are unaware of future rule updates, or if the SNA boundaries are imprecisely defined.	Not specified.	Accept in part	No
Steve West	2.8	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that alternative options should be pursued to manage indigenous biodiversity on private land. SNA provisions in the district plan including: making signing up to SNA rules a voluntary option, Council negotiate purchase of land or seek agreement from owner on rules, use QEII tools, and establish a city wide campaign of native planting.	Seeks that alternative policy options are explored: a) Remove all private land from the Significant Natural Area requirement. b) Make signing up to Significant Natural Areas on private land voluntary, and if coupled with Council incentives would see some landowners signing up to lock in their Significant Natural Area for future generations. c) If there were a significant area of private land (say more than one hectare) the Council could negotiate with that landowner to seek agreement on how to protect this area, or even to purchase the land for addition to the Council's land reserves. d) The Council could accept all types of protection including QEII and title conservation covenants. This would require the Council to create more nuanced maps with multiple protection measures shown (including Significant Natural Areas) as a measure of the protected indigenous biodiversity areas. e) Establish a program to encourage city wide planting of suitable natives to provide a broad spread of food across the city.	Accept in part	No
Shannon Andrews	12.1	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Supports WCC's decision to exclude SNAs from residential zones.	Retain as notified.	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Peter Kelly	16.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residential zoned land.	Supports the Proposed District Plan as notified - with no Significant Natural Areas on residentially zoned land.	Accept	No
Barry Insull	32.1	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that the PDP does not identify why shingle beaches are endangered. At several points it is recorded that shingle beaches are endangered e.g. site 122 (Toungue Point). Given numerous shingle beaches exist between Owhiro Bay and Makara perhaps it would be helpful to explain both why such a designation exists and set out what mitigation/enhancement measures are being undertaken and by whom.	Clarify the endangered status of shingle beaches.	Reject	No
Barry Insull	32.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that the PDP does not identify what mitigation/enhancement measures are being undertaken to protect shingle beaches. At several points it is recorded that shingle beaches are endangered e.g. site 122 (Toungue Point). Given numerous shingle beaches exist between Owhiro Bay and Makara perhaps it would be helpful to explain both why such a designation exists and set out what mitigation/enhancement measures are being undertaken and by whom.	Seeks that the PDP make mention of what mitigation and enhancement measures to protect shingle beaches are being undertaken.	Reject	No
Barry Insull	32.3	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that the PDP does not identify who is undertaking mitigation/enhancement measures to protect shingle beaches. At several points it is recorded that shingle beaches are endangered e.g. site 122 (Toungue Point). Given numerous shingle beaches exist between Owhiro Bay and Makara perhaps it would be helpful to explain both why such a designation exists and set out what mitigation/enhancement measures are being undertaken and by whom.	Seeks that the PDP make mention of who is undertaking mitigation and enhancement measures to protect shingle beaches.	Reject	No
Hugh Good	90.3	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Not specified	Not opposed to attempts to reinstate Significant Natural Areas on private land.	Not Specified	Reject	No
Capital Kiwi Trust Board	91.1	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that there is a level of concern across landowners in the Capital Kiwi project area around the potential for SNAs to be declared over their properties in the future should kiwi either be released onto their land or be ranging onto them. In particular, concern is around any potential to unreasonably limit, restrict or prevent operations or developments on their land. Considers that the Capital Kiwi project would not be possible without the trust and support of a wide range of rural private landowners. Considers that based discussions with the Minister of Conservation, and officials in DOC (Director General and Head of Policy), GWRC, and WCC, each party makes it clear that the declaration of SNAs on private land as the result of having North Island brown kiwi on their land is not a possible outcome. [Refer to submission for full reasons].	Clarify the intent of the Significant Natural Area policy to provide assurance that Significant Natural Areas will not, and cannot, be created through native bird species being released onto, or visiting landowners' properties as a result of their commitment to predator control.	Reject	No
Airways Corporation of New Zealand Limited	FS106.1	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Policy 23 of the Regional Policy Statement for the Wellington Region (RPS) sets out the criteria for identifying significant ecosystems and habitats (i.e. SNAs). Ecosystems and habitats will be considered significant if they meet one or more of the criteria listed under Policy 23. Point d of Policy 23 states "provides seasonal or core habitat for protected or threatened indigenous species". The definition of protected species under the RPS is "Species protected by the Wildlife Act 1953 and the Marine Mammals Protection Act 1978". Although North Island Brown Kiwi have a conservation status of "not threatened" under the NZ Threat Classification System, they are "absolutely protected" under the Wildlife Act 1953. As such, it is considered that the seasonal or core habitat of the North Island Brown Kiwi (or any other protected indigenous species) would meet the criteria of a SNA under Policy 23 of the RPS and would therefore be required to be scheduled in WCC's District Plan as a SNA. It is noted that areas used intermittently by protected indigenous species may not meet the criteria of a SNA, however, could meet the criteria for a highly mobile fauna area under the NPS-IB exposure draft. Note: The North Island Brown Kiwi has not been identified as highly mobile fauna under Appendix 2 of the NPS-IB exposure draft.	Allow / Acknowledges that the presence of kiwi would currently result in eligibility for SNA status and seeks that that submission be allowed in part.	Reject	No
Oliver Sangster	112.9	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support in part	Generally supports the use of SNA provisions	Retain Significant Natural Area provisions with amendment.	Accept in part	No

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Oliver Sangster	112.10	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Not specified	[Inferred reasons] Considers that awareness is needed about SNAs, what they do, their benefits, and how to work appropriately within and around them.	Seeks that the implementation of the Proposed District Plan be coupled with a strong public education campaign about Significant Natural Areas.	Accept in part	No
Pam Wilson	120.4	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Oppose any attempt to reinstate Significant Natural Areas on private land.	Not specified.	Accept	No
Thomas Brent Layton	164.4	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that the WCC should abandon the SNA overlay and instead enter into negotiations. This will focus WCC and the community's mind on what value they place on conserving areas. Considers that If the council thinks that there is a net benefit to society from an SNA it should negotiate with the current owners over the imposition of controls and impose the costs of preservation on all ratepayers. If they don't think the community will bear the costs sought by the landowner, then, clearly, the community (which includes the landowner) will be better off if the land is not subject to an SNA. [Refer to original submission for full reasons].	Adopt a policy of negotiating with current landowners for agreement to preserve significant natural areas.	Reject	No
Helen Grove	197.1	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Opposes the Council confiscating land rights of private ownership in multiple ways, including SNAs.	Opposes Significant Natural Areas on urban or rural private land.	Accept in part	No
Boston Real Estate Limited	220.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that where 'site specific' assessments are not completed then the status quo of the operative district plan should prevail.	Reject	No
Tyers Stream Group	221.31	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Opposes exception of residentially zoned land to SNA classification.	Amend the plan to include significant natural areas on privately owned residential land.	Reject	No
Steve West	FS110.1	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Notes that original submitter states that "SNAs on residential private property adjoining Tyers Stream should be reinstated as they protect increasingly important habitat and biodiversity of the Wellington area. Considers that this would then enable those residents and the community to be supported in efforts to enhance those values." The original submitter also infers that without SNAs on private urban land, Wellington's indigenous biodiversity would be worse. Opposes the reinstatement of SNAs on residential private property in the Proposed District Plan (including around Tyers Stream) for the following reasons: - Indigenous biodiversity in Wellington has increased significantly over the last 20 years, without any need for SNAs. Rather voluntary conservation efforts have been hugely successful in Wellington City. - Considers that instead of supporting residents, creating SNAs on private urban land in the district plan will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner value and goodwill in the process. There is real risk that indigenous biodiversity gains achieved over the last two decades will diminish over time should SNAs be created on private urban land.	Disallow	Accept	No
Paul Blaschke	FS129.10	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".	Allow	Reject	No
Dominic Hurley	260.1	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Considers that site owners will lose control and value of their land due to SNA's. SNA's on land will drive owners to remove the native bush to avoid SNA status, having the opposite effect. Incentives should be offered instead.	Remove the Ecosystems and Indigenous Biodiversity Chapter from the PDP.	Reject	No

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Dominic Hurley	260.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Considers that site owners will lose control and value of their land due to SNA's. SNA's on land will drive owners to remove the native bush to avoid SNA status, having the opposite effect. Incentives should be offered instead.	Seeks that Significant Natural Areas are not applied to residentially zoned private land in the future.	Reject	No
Horokiwi Quarries Ltd	271.21	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that there is a restrictive policy and rule framework that would apply to SNAs (and in particular where the sites are within a Coastal Environment overlay) and wishes to ensure any sites that are identified are in fact warranted as significant areas. Horokiwi does have concerns with particular areas on both its site and on the adjoining land to the west, in terms of whether the biodiversity values merit the specific areas being identified as SNAs. Based on the independent ecological assessment, Horokiwi seeks amendment to the SNA area identified. [Refer to original submission for full reason, including attachments]	Seeks that the Significant Natural Area overlay be amended as it relates to the Horokiwi quarry site including to remove the SNA from the Horokiwi site which is subject to the existing use certificate reference 1048648. [Refer to original submission, including figure and attachments]	Accept in part	yes
Director-General of Conservation	FS106.2	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	The methodology used to determine SNAs for the PDP should align with the criteria of Policy 23 of the Regional Policy Statement for the Wellington Region. It is also considered effective and efficient to align the review of Significant Natural Area provisions with the policy direction and requirements that are anticipated to come into effect during the PDP hearing process as set out in the exposure draft of the National Policy Statement on Indigenous Biodiversity (NPS-IB). Removal or amendments to the extent of any SNA is not supported without the site being ground-truthed by a suitably qualified ecologist to confirm the accuracy of the current SNA mapping in Schedule 8. The SNA opposed by Horokiwi Quarries Ltd should be ground-truthed before a determination is made to retain, amend, or remove the site/SNA from Schedule 8. If the site does not meet the SNA criteria under the NPS-IB exposure draft or the RPS, only then should it be removed.	Disallow / Seeks that the submission is disallowed, unless it can be confirmed that the site does not meet the relevant SNA criteria		
Jane Hurley	286.1	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Opposes significant natural area controls, but if are included on residential land considers that the Council should at the market price, and that that compensation should be determined at the point at which owners wish to sell their property, so that it reflects the actual market loss suffered at that point. [Refer to original submission for full reason]	Seeks that compensation be provided to private landowners should residential zoned sites have significant natural area controls applied.	Reject	No
Tawa Community Board	294.10	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Supports the protection of our ecology on public land by the use of the Significant Natural Area (SNA). Considers that SNA's on private land may leave some property owners with unusable land, leading to financial hardship.	Retain ECO Chapter as notified (with regards to Significant Natural Areas).	Accept in part	No
Tawa Community Board	294.11	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Not specified	Considers that SNA's on private land may leave some property owners with unusable land, leading to financial hardship.	Not specified.	Accept in part	No
Roland Sapsford	305.29	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that Aro Valley's vegetation should be considered natural heritage. Aro Valley is recognised for the significant presence of vegetation within its urban fabric, along with its built environment. Significant Natural Areas are not the only tool at the Council's disposition. Creative use can be made of design controls which recognise the value of green space and enable design conversations about its retention.	Seeks that Aro Valley's vegetation be considered natural heritage and make creative use of planning tools to protect it.	Reject	No
Wilma Sherwin	306.4	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Opposes any attempts to re-instate Significant Natural Areas (SNA's) on private land.	Supports that Significant Natural Areas do not apply to private urban land. [Inferred decision requested]	Accept	No
Wilma Sherwin	306.5	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Opposes any attempts to re-instate Significant Natural Areas (SNA's) on private land.	Supports that Significant Natural Areas do not apply to private rural land. [Inferred decision requested]	Accept	No
Bruce Crothers	319.9	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Not specified	Considers that support for revegetation of marginal land and restoration of wetlands for biodiversity and carbon sequestration should be continued. No further draining or development on wetland. It is considered that if humans are to survive as a species for more than fifty years, the Council must put in place the means to reduce emissions and ensure carbon sequestration by restoring green spaces and wetlands, as per the IPCC report.	Seeks that the council put in place the means to reduce emissions and ensure sequestration of carbon by restoring greenspace and wetlands, as per the IPCC report as well as ensuring no further draining or development of, wetlands.	Reject - managed by NES-F regulation 45C	No
Bruce Crothers	319.10	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Opposes the draining or development of wetlands.	Not specified.	Reject - managed by NES-F regulation 45C	No

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Bruce Crothers	319.11	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that there should be a ban on the covering of waterways in green fields development.	Seeks a ban on covering waterways in greenfield development	Accept in part	No
Bruce Crothers	319.12	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers the Queen's chain should be restored, possibly allowing for public walking network and wildlife corridor.	Seeks that the Queen's chain is restored.	Accept in part	No
Bruce Crothers	319.13	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Not specified	Considers that the Council needs to intervene on the noticeable biodiversity collapse by not allow the wholesale destruction of nature on land, in the air and sea, or any destruction of irreplaceable natural assets.	Seeks that Council protect nature on land, in the air and in the sea, as well as any irreplaceable natural assets.	Accept in part	No
Royal Forest and Bird Protection Society	345.171	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Not specified	Generally supports the provisions in this chapter, subject to the submission points below. As discussed above, the SNA provisions applying to residential SNAs must be reinstated from the previous version of the Plan. Reinsert all provisions relating to SNAs in residential zones, from the District Plan draft dated 20 April 2022 (ECO chapter is attached to this submission) with amendments as set out below. This includes any deleted references to residential SNAs or SCHED 9 - Urban Environment Allotments that may have been included in other parts of the Plan. If this is not done, there will need to be an alternative rule or rules to protect significant biodiversity in residential areas, that still meets the requirements of the Act. Insert additional provisions in this chapter and in other relevant chapters to provide for Council's function for the maintenance of indigenous biodiversity, including regulatory methods to restrict vegetation clearance and policy direction for assessments of effects on indigenous biodiversity. Include provisions to promote maintenance, restoration, and enhancement of areas within and beyond SNAs. There appears to be a referencing problem with several of the provisions. The provisions seem to have retained the references to policies prior to the deletion of the residential SNAs. We seek that all references to ECO policies are reviewed to ensure that they are accurate.	Not specified.	Reject	No
Kāinga Ora – Homes and Communities	FS89.157	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Kāinga Ora opposes amendments as this may impact on residential intensification outcomes.	Disallow	Accept	No
Director-General of Conservation	FS106.3	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	The reasoning and decision requested by the original submitter is supported.	Allow	Reject	No
Steve West	FS110.3	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Disagree that reinstatement of residential SNAs in the Proposed District Plan is required for WCC to meet its obligations under section 6(c) of the RMA and policies 23/24 of the Regional Policy Statement for the following reasons: - Neither the RMA or RPS prescribe in detail how a council might give effect to the requirement to protect of areas of significant indigenous vegetation and significant habitats of indigenous fauna. On note, in the 2015 Environment Court case between Forrest & Bird and New Plymouth District Council the Environment Court concluded Councils might conceivably meet RMA Section 6(c) duties through methods other than identification and rules, but in this case the non-regulatory methods relied on by the Council were insufficient to provide protection. - Alternative methods of compliance are available to WCC. - Indigenous biodiversity in Wellington (including on private urban land) has increased significantly over the last 20 years, including Zealandia and Predator Free, along with voluntary conservation efforts without any need for SNAs. - Creating SNAs on private urban land will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner value and goodwill in the process. Real risk that indigenous biodiversity gains achieved over the last two decades will diminish should SNAs be created on private urban land, and as a result would see both GWRC and WCC failing to meet their regulatory obligations, including under the RMA. - Specifically for Captain Edward Daniell Drive, indigenous biodiversity is already protected under Section 3 of the Land Covenant registered on the records of title. Considers that as the NPSIB is in draft form and has no legal effect, and given how unpopular SNAs proved to be in submissions on the draft district plan, pushing on with creating SNA on private urban land before the policy statement is in effect would further undermine WCC's already poor relationship with impacted landowners. [Refer to further submission for full reason]	Disallow / Seeks that part of submission be disallowed and that already protected land (such as Captain Edward Daniell Drive) be removed from Schedule 9, should residential SNAs be reinstated.	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Wellington City Council Environmental Reference Group	FS112.23	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Support the position that the SNA provisions applying to residential SNAs must be reinstated from the previous version of the Plan. Reinsert all provisions relating to SNAs in residential zones, from the District Plan draft dated 20 April 2022. Further support amendment to clarify the wider role of the Council maintaining biodiversity wider than SNAs. We support the submission point and need an objective stating the district's biodiversity is maintained and enhanced. Support the need for a new suite of objectives, policies, and rules to provide for protection of wetlands.	Allow	Reject	No
Royal Forest and Bird Protection Society	345.172	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support in part	Considers the Introduction is silent on the Council function of maintaining biodiversity, which is wider than only protection SNAs. The purpose of this chapter is to identify significant natural areas within Wellington City to protect and maintain the remaining areas of indigenous biodiversity. In addition to the requirement to identify and protect significant natural areas, Council also has the job of maintaining biodiversity outside of significant natural areas. This chapter contains provisions which support that function.	Amend the Introduction to the Ecosystems and Indigenous Biodiversity chapter: The purpose of this chapter is to identify significant natural areas within Wellington City to protect and maintain the remaining areas of indigenous biodiversity. <u>In addition to the requirement to identify and protect significant natural areas, Council also has the job of maintaining biodiversity outside of significant natural areas. This chapter contains provisions which support that function.</u> ... The SNAs that are covered by this chapter are contained in SCHED8 – Significant Natural Areas, SCHED 9 – Urban Environment Allotment, and any area that biodiversity values that meet Policy 23 RPS. Where SNAs are within an urban environment allotment the trees and location are identified in SCHED9 – Urban Environment Allotments to meet the requirements of s76 of the RMA.	Accept in part	No
Wellington City Council Environmental Reference Group	FS112.24	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Support the position that the SNA provisions applying to residential SNAs must be reinstated from the previous version of the Plan. Reinsert all provisions relating to SNAs in residential zones, from the District Plan draft dated 20 April 2022. Further support amendment to clarify the wider role of the Council maintaining biodiversity wider than SNAs. We support the submission point and need an objective stating the district's biodiversity is maintained and enhanced. Support the need for a new suite of objectives, policies, and rules to provide for protection of wetlands.	Allow	Accept in part	No
Greater Wellington Regional Council	351.144	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support in part	Supports the identification of SNAs in the PDP in accordance with RPS Policies 23 and 24.	Retain provision, subject to amendments, as outlined other submission points.	Accept in part	No
Greater Wellington Regional Council	351.145	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Considers that in managing the effects of intensification on indigenous ecosystems and habitats, we recommend WCC includes additional controls for zones where intensification may occur in areas adjacent to SNAs, such as buffer zones and ecological corridors. Such areas contribute to the long-term viability and enhancement of SNAs. Greater Wellington seeks consideration of these measures in accordance with Policy 47(a) and (b) of the operative RPS.	Seeks to include any necessary consequential amendments to provide this direction.	Reject	No
Director-General of Conservation	FS106.4	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	The reasoning and decision requested by the original submitter is supported.	Allow	Reject	No
Wellington City Council Environmental Reference Group	FS112.9	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Support GWRC seeking that WCC includes additional controls for zones where intensification may occur in areas adjacent to SNAs, such as buffer zones and ecological corridors. Agree with them that such areas contribute to the long-term viability and enhancement of SNAs, and also give effect to Policy 47(a) and (b) of the operative RPS.	Allow	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Greater Wellington Regional Council	351.146	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Though Greater Wellington supports WCC's identification of SNAs in line with RPS Policy 23, we oppose the omission of SNAs on private residential land from the Proposed District Plan (PDP) because: <ul style="list-style-type: none"> the removal of identified SNAs from the PDP contradictory to national direction for indigenous biodiversity protection. Section 6(c) of the RMA 1991 states that 'the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna' is a matter of national importance, and that this matter must be 'recognised and provided for' by all persons exercising functions and powers under the RMA, including local authorities under Sections 30 and 31. the removal of SNAs on private residential land from the PDP is contrary to Policy 24 of RPS. Policy 24 directs district councils to include in their district plans policies, rules and methods to protect the indigenous ecosystems and habitats identified in accordance with policy 23. Policy 24 requires district councils to protect all areas identified in accordance with policy 23 through provisions in their district plans. the removal of identified SNAs on private residential land from the PDP to be inconsistent with WCC's vision and aspirations for protecting and restoring the city's indigenous biodiversity. The Our Natural Capital: Wellington's Biodiversity Strategy and Action Plan 2015[1] states that WCC will protect biodiversity by 'focussing on the protection of priority biodiversity sites on public and private land and rare, threatened, or locally significant species', and that it will build natural capital by 'respect[ing] the importance of indigenous biodiversity to New Zealand and its intrinsic right to exist'. We do not consider the exclusion of SNA on private residential land to align with this direction. 	Seeks to apply SNAs to all zones as intended by section 6 of the RMA and Policy 24 of the RPS.	Reject	No
Director-General of Conservation	FS106.5	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	The reasoning and decision requested by the original submitter is supported.	Allow	Reject	No
Steve West	FS110.12	Part 2 / Natural and Environmental Values /	Oppose	Do not agree that reinstatement of SNAs on residential private property in the PDP is required for WCC to meet its obligations under section 6(c) of the RMA and policies 23/24 of the Regional Policy	Disallow / Seeks that part of submission be disallowed and that already protected land (such as Captain Edward Dainell Drive) be removed from Schedule 9, should residential SNAs be reinstated.	Accept	No
Wellington City Council Environmental Reference Group	FS112.10	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Support GWRC's opposition to the omission of SNAs on private residential land from the Proposed District Plan (PDP) because: <ul style="list-style-type: none"> the removal of identified SNAs from the PDP is contradictory to the national direction for indigenous biodiversity protection; is also contrary to Policy 24 of RPS;and is inconsistent with WCC's Our Natural Capital: Wellington's Biodiversity Strategy and Action Plan 2015. 	Allow	Reject	No
Wellington City Council Environmental Reference Group	FS112.27	Part 2 / Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S3	Support	WCCERG agree with the submitter and oppose the omission of SNAs on private residential land from the Proposed District Plan (PDP).	Allow	Reject	No
Greater Wellington Regional Council	351.147	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Policy IE.1 of Proposed RPS Change 1 directs district plans include policies, rule or methods to partner with mana whenua to managing indigenous biodiversity values. where offsetting is required, this policy could be implemented by provisions requiring management plans for managing offset biodiversity areas and effects on significant areas. Monitoring requirements would form part of these plans and plan direction could encourage the adoption of mātauranga Māori in monitoring of indigenous species in relevant circumstances. Other relevant Proposed RPS Change 1 policies include Policy 47 and IE.2.	Seeks to Amend the PDP to require partnering with mana whenua in the management of activities that affect indigenous biodiversity. Consider the requirement for management plans for consents and within those management plans a requirement for enabling tangata whenua to exercise kaitiakitanga to monitor biodiversity.	Reject as this work is deferred	No
Director-General of Conservation	FS106.6	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	The reasoning and decision requested by the original submitter is supported.	Allow	Reject as this work is deferred	No
Wellington City Council Environmental Reference Group	FS112.11	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Support GWRC's request to require partnering with mana whenua in the management of activities that affect indigenous biodiversity. This is because Policy IE.1 of Proposed RPS Change 1 directs district plans to include policies, rules or methods to partner with mana whenua to manage indigenous biodiversity values.	Allow	Reject as this work is deferred	No
Te Rūnanga o Toa Rangatira	FS138.25	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	The submitter seeks to amend the PDP to require partnering with mana whenua in the management of activities that affect indigenous biodiversity. They also seek that the requirement for management plans for consents is considered, and within those management plans a requirement for enabling tangata whenua to exercise kaitiakitanga to monitor biodiversity. Te Rūnanga o Toa Rangatira support this part of the submission because requiring partnership with mana whenua in the management of indigenous biodiversity will support kaitiakitanga. This will support mana whenua in building their mātauranga and skills in relation to monitoring and management of biodiversity and te taiao.	Allow	Reject as this work is deferred	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Greater Wellington Regional Council	351.148	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that while mana whenua / tangata whenua exercising their role as kaitiaki have been provided for, we consider the policy requires amendment or a new policy inserted to specifically recognise mana whenua / tangata whenua involvement in the mapping of indigenous biodiversity, including to identify taonga species. This would be to have regard to Proposed RPS Change 1 policies IE.1 and IE.2.	Seeks to amend to provide for mana whenua / tangata whenua involvement in the mapping of indigenous biodiversity, including to identify taonga species.	Reject as this work is deferred	No
Director-General of Conservation	FS106.7	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	The reasoning and decision requested by the original submitter is supported.	Allow	Reject as this work is deferred	No
Te Rūnanga o Toa Rangatira	FS138.26	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	The submitter seeks to amend to provide for mana whenua / tangata whenua involvement in the mapping of indigenous biodiversity, including to identify taonga species Te Rūnanga o Toa Rangatira support this part of the submission because providing for mana whenua involvement in mapping indigenous biodiversity and taonga species will also support kaitiakitanga and the ability of mana whenua to build their skills and mātauranga.	Allow	Reject as this work is deferred	No
Greater Wellington Regional Council	351.149	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers amendments are required have regard to Policies IE.1 and IE.2 of Proposed RPS Change 1. We consider the adverse effects on mahinga kai, other customary uses and access for these activities needs to be included as an assessment matter for consent applications	Seeks to include a new matter of discretion/control to consider the adverse effects on mahinga kai, other customary uses and access for these activities.	Reject as this work is deferred	No
Director-General of Conservation	FS106.8	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	The reasoning and decision requested by the original submitter is supported.	Allow	Reject as this work is deferred	No
Richard Herbert	360.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Supports the retention of SNAs as proposed originally, before the Councillor amendment to remove SNAs from residential zones in June 2022.	Amend Significant Natural Areas to re-instate on Residential Zones, as proposed prior to the Councillor Amendment to remove Significant Natural Areas from Residential Zones in June 2022.	Reject	No
Te Kamaru Station Ltd Ratings	362.4	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that SNAs should not be on private property.	Seeks that Significant Natural Areas be removed Significant Natural Areas on private property in both urban and rural environments. [Inferred decision requested].	Reject	No
WCC Environmental Reference Group	377.115	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that Schedule 8 should include all the SNAs identified in the draft district plan version provided to the Council's environment committee from officers. "Wellington, wild at heart" is what our unique capital city trades upon - and as the population grows and urban areas densify, preserving and enhancing significant natural areas will become increasingly important. Research shows that access to natural areas, and 'biophilic' environments are keys to human health and well-being and are a critical part of protecting biodiversity. On this matter, Wellington as a city is playing a critical role in providing refuge for formerly at risk native birds, e.g. kaka, and with efforts such as the Halo Project and Predator Free initiatives being undertaken by thousands of Wellingtonians, it is important our city's district plan provides legal and policy support to this. The failure to include SNA areas in residential zones means that the district plan is not in accordance with section 6 of the RMA, nor is it giving effect to relevant provisions of GWRC's regional policy statement and regional plan.	Seeks that Significant Natural Areas to add all the SNA areas in the residential zones recommended by officers in the draft district plan version provided to the Council's environment and planning committee on June 23 2022.	Reject	No
Director-General of Conservation	FS106.9	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	The decision requested by the original submitter is supported. The omission of SNAs on private residential sites in the PDP is considered contrary to section 6(c) of the RMA and Policy 23 & 24 of the RPS. It is also considered contrary to the NPS-IB exposure draft. It is noted at the time of this further submission the NPS-IB exposure draft no legal effect, however, it is expected to come into effect in December 2022 prior to the PDP hearing process.	Allow	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Steve West	FS110.18	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>The original submitter seeks that Schedule 9 of the draft district plan be reinstated (adding back SNAs on private residential land), citing this exclusion is contradictory to both section 6(c) of the RMA and Policies 23/24 of the Regional Policy Statement.</p> <p>Steve West does not agree that reinstatement of SNAs on residential private property in the Proposed District Plan is required for WCC to meet its obligations under section 6(c) of the RMA and policies 23/24 of the Regional Policy Statement for the following reasons:</p> <ul style="list-style-type: none"> - Neither the RMA or RPS prescribe in detail how a council might give effect to the requirement to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna. On note, in the 2015 Environment Court case between Forrest & Bird and New Plymouth District Council the Environment Court concluded Councils might conceivably meet RMA Section 6(c) duties through methods other than identification and rules, but in this case the non-regulatory methods relied on by the Council were insufficient to provide protection. - In any case, indigenous biodiversity in Wellington (including on private urban land) has increased significantly over the last 20 years, including through activities like Zealandia and Predator Free, along with voluntary conservation efforts without any need for SNAs. These activities have contributed significantly to the recovery of birds like the Kaka, and proves the current voluntary conservation efforts are working well. - Creating SNAs on private urban land in the district plan will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner value and goodwill in the process. So rather than providing legal protection for our flora and fauna, there is real risk that indigenous biodiversity gains achieved over the last two decades will diminish over time should SNAs be created on private urban land. <p>[Refer to further submission for full reason]</p>	Disallow / Seeks that SNAs on private urban land remain excluded from the Proposed District Plan.	Accept	No
Taranaki Whānui ki te Upoko o te Ika	389.73	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support in part	Supports the general direction of chapter, with amendments.	Retain ECO chapter with amendments.	Accept in part	No
Taranaki Whānui ki te Upoko o te Ika	389.74	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Opposes the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford.</p> <p>Submitter supports the protection of areas of significant indigenous vegetation as well as landscapes that have cultural, historical, spiritual and traditional significance to Taranaki Whānui, the identification and protection of environmental overlays in previously developed areas is of concern to Taranaki Whānui.</p> <p>Concerns there is potential for these overlays to significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over their ancestral lands.</p>	Seeks that the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford is removed; specifically at Part Lot 1 DP 4741, Section 4 SO 477035, PT LOT 1 DP 4741 - WELLINGTON PRISON, Section 1 SO 477035, Part Section 20 Watts Peninsula DIST.	Reject	No
Laurence Harger & Ingrid Kölle	FS2.9	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Taranaki Whānui has sold the land it owned at Shelly Bay to The Wellington Company for a large development which was consented via the Special Housing Accords Act, thus denying the community any say on the consenting process. Community involvement should be ensured for the future though and the current DP height limit of 11 metres in some areas and the zero height limit in Open Space B land should remain. A recent poll has shown that the wider Wellington public want Shelly Bay included in a National Heritage Park centred on the 76 hectares of Watts Peninsula already designated for a reserve by the Government.</p> <p>Taranaki Whānui have treated Shelly Bay solely as a commercial proposition despite disagreement by a large group of its members (Mau Whenua) who occupied the site and opposed its sale, wanting to uphold their cultural and spiritual connection to the land. Mau Whenua continue to oppose the sale of the land at Shelly Bay and should be included by the council in all decisions taken about its future.</p>	Disallow / Seeks that the provisions relating to Shelly Bay in submission 389 are disallowed.	Accept	No
Laurence Harger & Ingrid Kölle	FS2.21	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	76 hectares of Watts Peninsula has been set aside by the government as a reserve focused on protecting iwi and military history sites and retaining the value of the natural landscape of the area. Supports the establishment of such a reserve and would like to see it become part of the National Heritage Park proposed by the Buy Back the Bay group. The zoning and overlays of the Proposed District Plan must be kept if the reserve/heritage park is to be a viable option. Taranaki Whānui's requests would remove many protections that have been longstanding and unopposed for decades, which must surely not occur without extensive community engagement. Watts Peninsula, with its ridges and hill lines visible from all over Wellington, should remain undeveloped, which might very well not be the case if the land is rezoned.	Disallow / Seeks that the part of the submission to remove the proposed zoning and overlays on Watts Peninsula be disallowed.	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Enterprise Miramar Peninsula Inc	FS26.10	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>It is clear Taranaki Whānui want all restrictions removed, and the Corrections land at least rezoned for medium density housing. It is unclear based on the submission exactly how large an area they want to have rezoned.</p> <p>Watts Peninsula is currently zoned Open Space B in the Operative (current) District Plan, both the Corrections and Defence Land have not in the past contested this zoning and the Proposed District Plan keeps Watts Peninsula as open Space, the Ridgelines and Hilltops add to significant Natural Areas (for biodiversity) it has a Special Amenity Landscape which is used by the community and tourists to the enjoyment of being close to a city but with a natural environment.</p> <p>Taranaki Whānui are seeking to amend the zoning in this area to Medium Density Residential or to a Special Purpose Zone – Māori Purpose Zone, without any public engagement. Such changes would have a significant impact on the local community and should not be undertaken without wider consultation and engagement in order to ensure that proposed changes do not have a detrimental effect. As noted above, it is of concern to the businesses, community (ratepayers) of Te Motu Kairangi/Miramar Peninsula and the wider public that the rezoning applied for by Taranaki Whānui (currently open space) to develop a papakainga creates infrastructure issues on an already overloaded roading, flooding and transport links to and from the Peninsula.</p> <p>[Inferred reference to submission 389.74].</p>	Disallow	Accept	No
Mary Varnham and Paul O'Regan	FS40.9	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Taranaki Whānui has sold its holdings at Shelly Bay and are no longer, as claimed, 'significant landowners'. Their possible ownership interest in the peninsula as a whole through Right of First Refusal is confined to the Mt Crawford site as the adjacent 76 hectares of Watts Peninsula has been designated reserve by the government (the current landowner) and WCC since 2011.</p> <p>The local community, despite its active interest in and use of the bay, was shut out of all consultation during the resource consent process. It is critical that it be involved in all future decision making.</p> <p>The current DP height limit of 11 metres in some areas and the zero height limit in Open Space B land is supported not only by the local community but by the wider Wellington public, as evidenced in the independent poll conducted for the group Buy Back the Bay by Research NZ, which showed that 78% of Wellingtonians want Shelly Bay included in a National Heritage Park, which would also include the 76 hectares of Watts Peninsula set aside by the government as a reserve in 2011.</p> <p>Taranaki Whānui have viewed Shelly Bay as a strictly commercial proposition and disavowed any cultural, historical and spiritual connection to the site. A substantial proportion of the iwi (mau whenua) have opposed and continue to oppose the sale of the site, and should be included by the council in all democratic decision making about the future of Shelly Bay.</p>	Disallow	Accept	No
Mary Varnham and Paul O'Regan	FS40.21	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>From 2011 the 76 hectares of Watts Peninsula has been set aside by the government as a reserve, to incorporate and protect iwi (as well as military) sites and history. Submitter supports this as an appropriate and visionary plan for the peninsula.</p> <p>Submitter supports the proposal of Buy Back the Bay group that the area should become a National Heritage Park.</p> <p>Submitter supports a conservancy model for development and management of this park, to include iwi, government, council, the local community, and organisations such as Forest and Bird and Predator Free Miramar.</p> <p>Disallow all proposals by Taranaki Whānui to remove the proposed zoning and overlays. These provisions are vital to protect the natural values, history and landscape of Watts Peninsula, a prominent feature of Te Whanganui-a-Tara.</p> <p>Supports retaining all provisions in the proposed district plan for Open Space B, Ridgelines and Hilltops, Significant Natural Areas and Special Amenity Landscape. We note the magnificent work done by Predator Free Miramar. Protecting and enhancing the huge gains in bringing back birdlife made should be a primary consideration. We also believe the peninsula should see extensive planting and regeneration of native forest.</p>	Disallow	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Buy Back the Bay	FS79.8	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Submission 389 states as a Submission Point, that "Taranaki Whānui opp oses the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford."</p> <p>It lists the relevant PDP Chapter as:</p> <ul style="list-style-type: none"> • Planning maps • He Rohe Ahoaho Māori Natural Open Space Zone chapter • Ngā Wāhi Tapu ki te Māori Sites a nd Areas of Significance to Māori chapter • Ngā Pūnaha Rauropi me te Kanorau Koiora Taketake Ecosystems and Indigenous Biodiversity chapter • Te Ahurei o Ngā Hanga Māori Natural Character chapter • Ngā Hanga Māori me Ngā Nohopae Natural Features and L andscapes chapter • Wawaetanga Subdivision chapter • Taiao Takutai Coastal Environment chapter <p>Opposes in total Submission 389 on these points, which appears to be a wholesale rejection of planning rules in these areas.</p>	Disallow	Accept	No
Buy Back the Bay	FS79.25	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Submission 389 states: "Taranaki Whānui's RFR [Right of First Refusal] opportunities in Te Motu Kairangi: Taranaki Whānui have a significant interest in Te Motu Kairangi which includes Mount Crawford and Watts Peninsula, these landholdings hold significant interest - culturally, socially, environmentally and commercially to Taranaki Whānui. These opportunities include the Mount Crawford Prison site as well as the 'Watts Peninsula' sites being 75.85 hectares of former Defence Land."</p> <p>Buy Back the Bays notes that the Submission does not include maps however they (Buy Back the Bays) are very concerned to see that Taranaki Whānui appears to be seeking possible commercial development of 75.85 hectares of former defence land on Watts Peninsula. This appears to be the heart of the long-promised Watts Peninsula park and a major part of the proposed national heritage park.</p> <p>Buy Back the Bays strongly oppose rezoning on Watts Peninsula to facilitate any development there that is incompatible with the park plans. More generally, Buy Back the Bays oppose Submission 389's attempt to remove the proposed public interest controls from Watts Peninsula and Mount Crawford. Considers that where Submission 389 states "Illustrated on Figure One below, the following zone and overlays are proposed for Taranaki Whānui's RFR properties in Te Motu Kairangi," Buy Back the Bays oppose the changes it seeks. This includes opposing Submission 389's request for "The proposed zoning over Part Lot 1 DP 4741, Section 4 SO 477035, PT LOT 1 DP 4741 - WELLINGTON PRISON, Section 1 SO 477035, Part Section 20 Watts Peninsula DIST [to be] amended from Natural Open Space Zone to: a. Medium Density Residential; and b. Special Purpose Zone – Māori Purpose Zone."</p>	Disallow	Accept	No
Buy Back the Bay	FS79.44	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Refers to submission 389 states: Taranaki Whānui opposes the extent of the proposed zoning of Shelly Bay Taikuru and the proposed height control limits." Buy Back the Bays opposes the submission on both points.</p> <p>Specifically, the Submission 389 for Taranaki Whānui seeks that:</p> <p>"1. The Mixed Use Zone is extended across the allotments illustrated in Figure Two below or amended to follow the extent of consented development area outlined in the approved masterplan and engineering drawings.</p> <p>2. The Height Control Area is amended to 27m being the maximum height of development consented under the Shelly Bay Masterplan resource consent."</p> <p>Buy Back the Bays opposes both parts. Buy Back the Bays note that neither part affects Taranaki Whānui's commercial or other interests. Considers that both parts only affect the tall apartment buildings planned by and for the exclusive commercial benefit of The Wellington Company, not the leasing of lower existing buildings that The Wellington Company has offered to Taranaki Whānui as its stake in the project.</p>	Disallow	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Lance Lones	FS81.10	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Te Motu Kairangi is very nearly an island, and as a result of the amazing work of Predator Free Wellington, is in fact, nearly predator free, and uniquely able to support significant biodiversity. Combined with the Ridgelines and Hilltops Overlay, and the Significant Natural Areas overlay of this space, all citizens of both Wellington, and Aotearoa in general have an incredibly singular opportunity to support the development of native flora and fauna in one nearly contiguous environment, a situation which is unique within Wellington. Attests to the incredible return of many native species of birds to this area, from kererū, to flocks of piwakawaka and tūi, kārearea hunting on the hillsides and heard ruru calling in the evenings and mornings.</p> <p>To remove the Open Space zoning, Significant Natural Areas and Special Amenity Landscape overlays for a significant portion of this habitat would put these species at risk once again.</p> <p>Presents a unique opportunity to implement the Ministry for the Environment's Proposed National Policy Statement for Indigenous Biodiversity. This policy progressively refers to the concept of Te Rito o te Harakeke.</p> <p>The local community has expressed the desire to work with and develop a master plan for the Watts Peninsula, but this voice has been repeatedly denied by council. Removing the protections put in place by the proposed district plan would once again disempower the greater community with no discussion.</p> <p>[Refer to further submission for full reason]</p>	Disallow / Seeks that the current zoning and overlays as presented in the Proposed District Plan for the northern sections of Te Motu Kairangi / Miramar Peninsula be retained. In particular, that the Open Space zoning, Special Amenity Landscape, Natural Areas, and Ridgelines and Hilltops overlays are retained.	Accept	No
Andy Foster	FS86.16	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>The submission from Taranaki Whānui if accepted would remove all protections, many of them long standing and uncontested for decades, from Te Motu Kairangi / Watts Peninsula and make community involvement much less likely, and limit the need for community involvement. On these basis the submitter opposes Taranaki Whānui's submission.</p> <p>Watts Peninsula is currently zoned Open Space B in the Operative (current) District Plan. It has been Open Space B for at least the last 30 years, and nobody has ever contested this. That includes both the Corrections and Defence Land.</p> <p>The Proposed District Plan keeps Watts as Open Space and within the Ridgelines and Hilltops Overlay. It also adds Significant Natural Areas (for biodiversity) and a Special Amenity Landscape (because of its high level of landscape importance) All of these are based on good evidence. Taranaki Whānui want all of those restrictions removed, and the Corrections land at least rezoned for medium density housing. It is unclear exactly how large an area they want to have rezoned.</p> <p>Taranaki Whānui's request to remove the Open Space zoning which has been in place, uncontested by the owners, for at least 30 years. The current Open Space B zoning does not anticipate any built development and therefore there is no legal or reasonable expectation that there should be any development here.</p> <p>[See original Further Submission for full reasoning]. [Inferred reference to submission 389.74]</p>	Disallow	Accept	No
Taranaki Whānui ki te Upoko o te Ika	389.75	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	<p>Opposes the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford.</p> <p>Submitter supports the protection of areas of significant indigenous vegetation as well as landscapes that have cultural, historical, spiritual and traditional significance to Taranaki Whānui, the identification and protection of environmental overlays in previously developed areas is of concern to Taranaki Whānui.</p> <p>Concerns there is potential for these overlays to significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over their ancestral lands.</p>	Seeks that any other relief to enable Taranaki Whānui to exercise tino rangatiratanga over their properties in Te Motu Kairangi.	Reject	No
Laurence Harger & Ingrid Kölle	FS2.10	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Taranaki Whānui has sold the land it owned at Shelly Bay to The Wellington Company for a large development which was consented via the Special Housing Accords Act, thus denying the community any say on the consenting process. Community involvement should be ensured for the future though and the current DP height limit of 11 metres in some areas and the zero height limit in Open Space B land should remain. A recent poll has shown that the wider Wellington public want Shelly Bay included in a National Heritage Park centred on the 76 hectares of Watts Peninsula already designated for a reserve by the Government.</p> <p>Taranaki Whānui have treated Shelly Bay solely as a commercial proposition despite disagreement by a large group of its members (Mau Whenua) who occupied the site and opposed its sale, wanting to uphold their cultural and spiritual connection to the land. Mau Whenua continue to oppose the sale of the land at Shelly Bay and should be included by the council in all decisions taken about its future.</p>	Disallow / Seeks that the provisions relating to Shelly Bay in submission 389 are disallowed.	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Laurence Harger & Ingrid Kölle	FS2.22	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	76 hectares of Watts Peninsula has been set aside by the government as a reserve focused on protecting iwi and military history sites and retaining the value of the natural landscape of the area. Supports the establishment of such a reserve and would like to see it become part of the National Heritage Park proposed by the Buy Back the Bay group. The zoning and overlays of the Proposed District Plan must be kept if the reserve/heritage park is to be a viable option. Taranaki Whānui's requests would remove many protections that have been longstanding and unopposed for decades, which must surely not occur without extensive community engagement. Watts Peninsula, with its ridges and hill lines visible from all over Wellington, should remain undeveloped, which might very well not be the case if the land is rezoned.	Disallow / Seeks that the part of the submission to remove the proposed zoning and overlays on Watts Peninsula be disallowed.	Accept	No
Mary Varnham and Paul O'Regan	FS40.10	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Taranaki Whānui has sold its holdings at Shelly Bay and are no longer, as claimed, 'significant landowners'. Their possible ownership interest in the peninsula as a whole through Right of First Refusal is confined to the Mt Crawford site as the adjacent 76 hectares of Watts Peninsula has been designated reserve by the government (the current landowner) and WCC since 2011. The local community, despite its active interest in and use of the bay, was shut out of all consultation during the resource consent process. It is critical that it be involved in all future decision making. The current DP height limit of 11 metres in some areas and the zero height limit in Open Space B land is supported not only by the local community but by the wider Wellington public, as evidenced in the independent poll conducted for the group Buy Back the Bay by Research NZ, which showed that 78% of Wellingtonians want Shelly Bay included in a National Heritage Park, which would also include the 76 hectares of Watts Peninsula set aside by the government as a reserve in 2011. Taranaki Whānui have viewed Shelly Bay as a strictly commercial proposition and disavowed any cultural, historical and spiritual connection to the site. A substantial proportion of the iwi (mau whenua) have opposed and continue to oppose the sale of the site, and should be included by the council in all democratic decision making about the future of Shelly Bay.	Disallow	Accept	No
Mary Varnham and Paul O'Regan	FS40.22	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	From 2011 the 76 hectares of Watts Peninsula has been set aside by the government as a reserve, to incorporate and protect iwi (as well as military) sites and history. Submitter supports this as an appropriate and visionary plan for the peninsula. Submitter supports the proposal of Buy Back the Bay group that the area should become a National Heritage Park. Submitter supports a conservancy model for development and management of this park, to include iwi, government, council, the local community, and organisations such as Forest and Bird and Predator Free Miramar. Disallow all proposals by Taranaki Whānui to remove the proposed zoning and overlays. These provisions are vital to protect the natural values, history and landscape of Watts Peninsula, a prominent feature of Te Whanganui-a-Tara. Supports retaining all provisions in the proposed district plan for Open Space B, Ridgelines and Hilltops, Significant Natural Areas and Special Amenity Landscape. We note the magnificent work done by Predator Free Miramar. Protecting and enhancing the huge gains in bringing back birdlife made should be a primary consideration. We also believe the peninsula should see extensive planting and regeneration of native forest.	Disallow	Accept	No
Buy Back the Bay	FS79.9	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Submission 389 states as a Submission Point, that "Taranaki Whānui opposes the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford." It lists the relevant PDP Chapter as: <ul style="list-style-type: none">• Planning maps• He Rohe Ahoaho Māori Natural Open Space Zone chapter• Ngā Wāhi Tapu ki te Māori Sites and Areas of Significance to Māori chapter• Ngā Pūnaha Rauropi me te Kanorau Koiora Taketake Ecosystems and Indigenous Biodiversity chapter• Te Ahurei o Ngā Hanga Māori Natural Character chapter• Ngā Hanga Māori me Ngā Nohopae Natural Features and Landscapes chapter• Wawaetanga Subdivision chapter• Taiao Takutai Coastal Environment chapter Opposes in total Submission 389 on these points, which appears to be a wholesale rejection of planning rules in these areas.	Disallow	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Buy Back the Bay	FS79.26	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Submission 389 states: "Taranaki Whānui's RFR [Right of First Refusal] opportunities in Te Motu Kairangi: Taranaki Whānui have a significant interest in Te Motu Kairangi which includes Mount Crawford and Watts Peninsula, these landholdings hold significant interest - culturally, socially, environmentally and commercially to Taranaki Whānui. These opportunities include the Mount Crawford Prison site as well as the 'Watts Peninsula' sites being 75.85 hectares of former Defence Land."</p> <p>Buy Back the Bays notes that the Submission does not include maps however they (Buy Back the Bays) are very concerned to see that Taranaki Whānui appears to be seeking possible commercial development of 75.85 hectares of former defence land on Watts Peninsula. This appears to be the heart of the long-promised Watts Peninsula park and a major part of the proposed national heritage park.</p> <p>Buy Back the Bays strongly oppose rezoning on Watts Peninsula to facilitate any development there that is incompatible with the park plans. More generally, Buy Back the Bays oppose Submission 389's attempt to remove the proposed public interest controls from Watts Peninsula and Mount Crawford. Considers that where Submission 389 states "Illustrated on Figure One below, the following zone and overlays are proposed for Taranaki Whānui's RFR properties in Te Motu Kairangi," Buy Back the Bays oppose the changes it seeks. This includes opposing Submission 389's request for "The proposed zoning over Part Lot 1 DP 4741, Section 4 SO 477035, PT LOT 1 DP 4741 - WELLINGTON PRISON, Section 1 SO 477035, Part Section 20 Watts Peninsula DIST [to be] amended from Natural Open Space Zone to: a. Medium Density Residential; and b. Special Purpose Zone – Māori Purpose Zone."</p>	Disallow	Accept	No
Buy Back the Bay	FS79.45	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Refers to submission 389 states: Taranaki Whānui opposes the extent of the proposed zoning of Shelly Bay Taikuru and the proposed height control limits." Buy Back the Bays opposes the submission on both points.</p> <p>Specifically, the Submission 389 for Taranaki Whānui seeks that:</p> <p>"1. The Mixed Use Zone is extended across the allotments illustrated in Figure Two below or amended to follow the extent of consented development area outlined in the approved masterplan and engineering drawings.</p> <p>2. The Height Control Area is amended to 27m being the maximum height of development consented under the Shelly Bay Masterplan resource consent."</p> <p>Buy Back the Bays opposes both parts. Buy Back the Bays note that neither part affects Taranaki Whānui's commercial or other interests. Considers that both parts only affect the tall apartment buildings planned by and for the exclusive commercial benefit of The Wellington Company, not the leasing of lower existing buildings that The Wellington Company has offered to Taranaki Whānui as its stake in the project.</p>	Disallow	Accept	No
Lance Lones	FS81.11	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Te Motu Kairangi is very nearly an island, and as a result of the amazing work of Predator Free Wellington, is in fact, nearly predator free, and uniquely able to support significant biodiversity. Combined with the Ridgelines and Hilltops Overlay, and the Significant Natural Areas overlay of this space, all citizens of both Wellington, and Aotearoa in general have an incredibly singular opportunity to support the development of native flora and fauna in one nearly contiguous environment, a situation which is unique within Wellington. Attests to the incredible return of many native species of birds to this area, from kererū, to flocks of piwakawaka and tūi, kārearea hunting on the hillsides and heard ruru calling in the evenings and mornings.</p> <p>To remove the Open Space zoning, Significant Natural Areas and Special Amenity Landscape overlays for a significant portion of this habitat would put these species at risk once again.</p> <p>Presents a unique opportunity to implement the Ministry for the Environment's Proposed National Policy Statement for Indigenous Biodiversity. This policy progressively refers to the concept of Te Rito o te Harakeke.</p> <p>The local community has expressed the desire to work with and develop a master plan for the Watts Peninsula, but this voice has been repeatedly denied by council. Removing the protections put in place by the proposed district plan would once again disempower the greater community with no discussion.</p> <p>[Refer to further submission for full reason]</p>	Disallow / Seeks that the current zoning and overlays as presented in the Proposed District Plan for the northern sections of Te Motu Kairangi / Miramar Peninsula be retained. In particular, that the Open Space zoning, Special Amenity Landscape, Natural Areas, and Ridgelines and Hilltops overlays are retained.	Accept	No
Terawhiti Farming Co Ltd (Terawhiti Station)	411.4	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>SNAs are being arbitrarily being introduced without any consideration to the potential cost to the landowner that this policy will incur</p>	Not specified.	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
VicLabour	414.23	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	<p>Considers Significant Natural Areas are important in order to protect our environment and native plantlife.</p> <p>Considers that while the city is built denser, the environment and our wildlife should be protected.</p> <p>Considers that it is ironic that the argument for being anti-density is to protect the 'character' of our housing but yet there is no consideration for the 'character' of our nature, which is arguably much harder to restore than the character amenity gained from what the Council deems as character housing.</p>	Seeks that significant natural areas provisions apply to residentially zoned sites.	Reject	No
Steve West	FS110.22	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>The original submitter states "it is incredibly disappointing that they [SNAs] have been removed for residential land considering this land is at great risk of being damaged further".</p> <p>Steve West does not support the reinstatement of SNAs on residential private property in the Proposed District Plan for the following reasons:</p> <ul style="list-style-type: none"> - Indigenous biodiversity in Wellington (including on private urban land) has increased significantly over the last 20 years, through voluntary conservation and activities like Predator Free without any need for SNAs. - While recently there was reported felling of some native trees, this was in response to the planned SNA introduction in the draft district plan. Arguably the biggest threat to indigenous biodiversity on private urban land in Wellington remains how landowners might respond to the creation of SNAs, such as by reducing conservation efforts, in the face of their bush being turned into an expensive and unwanted burden. 	Disallow	Accept	No
Johnsonville Community Association	429.24	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Supports the protection of significant natural areas on public land within Wellington.	Not specified.	Accept in part	No
Johnsonville Community Association	429.25	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	<p>Considers that unilaterally taking over of private property is a major intrusion on rights of the property owners, and may lead to removal of major natural areas on urban property.</p> <p>Opposes SNA's on private urban or rural land.</p>	Opposes Significant Natural Areas on urban or rural private land.	Accept in part	No
Paul M Blaschke	435.5	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Objectives, Policies and Rules in the Ecosystems and Indigenous Biodiversity section are strongly supported, as they support a critical part of the city's overall vision and strategic objectives and are strongly supported by the overwhelming majority of the city's residents.	Retain the Ecosystems and Indigenous Biodiversity chapter as notified.	Accept in part	No
Paul M Blaschke	435.6	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	<p>Considers that the Council should allow SNAs on residentially zoned properties. The Council should be consistent with its overall policy objectives and let its original decisions on SNAs stand on their merits. The decision from Council's Planning & Environment Committee to remove SNAs from all residentially zoned properties on 23 June 2022 is opposed. This decision renders the Ecosystems and Indigenous Biodiversity section much less effective than it could and should be.</p> <p>It greatly hinders the achievement of Council's Te Atakura blueprint and other moves towards sustainability and resilience.</p> <p>It disadvantages the great majority of the city's residents except for a tiny number of suburban residential landowners who become privileged over all others including other suburban residential landowners with portions of SNAs within their properties and who have welcomed or not objected to the provisions.</p> <p>It overturns the very good process adopted by the council team and consultants who have planned and undertaken the SNA survey and policy development. Finally, it renders ECO-O1, ECO-P1, ECO-P2, and ECO-P3, and the rules supporting these objectives and policies, incapable of being properly implemented, and perpetuates the uncertainty caused by lack of a comprehensive statutory process around significant areas and indigenous biodiversity.</p> <p>[Refer to original submission for full reason]</p>	Seeks to extend Significant Natural Areas to residentially zoned properties.	Reject	No
Paul M Blaschke	435.7	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that the SNA regulatory framework in the Ecosystems and Indigenous Biodiversity section should apply to SNAs on residentially zoned properties.	Seeks that Ecosystems and Indigenous Biodiversity provisions apply to Significant Natural Areas on residentially zoned properties.	Reject	No
Meredith Robertshawe	444.1	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Supports the objectives and policies for Significant Natural Areas and support the intent of the provisions in the PDP.	Retain the objectives in the Ecosystems and Indigenous Biodiversity (ECO) chapter as notified.	Accept in part	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Meredith Robertshawe	444.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Supports the objectives and policies for Significant Natural Areas and support the intent of the provisions in the PDP.	Retain the policies in the Ecosystems and Indigenous Biodiversity (ECO) chapter as notified. [Inferred Decision Requested]	Accept in part	No
Meredith Robertshawe	444.3	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Supports the objectives and policies for Significant Natural Areas and support the intent of the provisions in the PDP.	Retain the provisions in the Ecosystems and Indigenous Biodiversity (ECO) chapter as notified. [Inferred Decision Requested]	Accept in part	No
Chris Horne, Sunita Singh, Julia Stace, Paul Bell-Butler	456.3	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support in part	Supports the protection of Indigenous Biodiversity and Significant Natural Areas. [Refer to original submission for full reason]	Retain Significant Natural Area provisions, with amendment. [Inferred decision requested]	Accept in part	No
Chris Horne, Sunita Singh, Julia Stace, Paul Bell-Butler	456.4	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that SNA-status should be restored to all residential-zoned properties. In particular considers that the Planning and Environment Committee vote to remove SNAs from all residential-zoned properties over-ride the purpose of the ECO chapter which " ... is to identify significant natural areas within Wellington City in order to protect and maintain the remaining areas of indigenous biodiversity".	Amend mapping of Significant Natural Areas to include all residential-zoned properties.	Accept in part	No
Chris Horne, Sunita Singh, Julia Stace, Paul Bell-Butler	456.5	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Considers that there should be monitoring compliance by all owners of Significant Natural Areas with Council's objective of protecting those SNAs' indigenous ecosystems in perpetuity.	Seeks that a monitoring programme for Significant Natural Areas is established. [Inferred decision requested]	Accept in part	No
Grant and Marilyn Griffiths, Griffiths Family Trust	460.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose in part	Opposes Significant Natural Areas on Private land.	Retain Significant Natural Area provisions with amendment below.	Accept in part	No
Te Rūnanga o Toa Rangatira	488.48	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Oppose	Opposes that significant natural areas provisions do not apply to residential zoned land.	Seeks that Significant Natural Area provisions are applied to all zones.	Reject	No
Royal Forest and Bird Protection Society	345.173	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Amend	Protection of SNAs and encouragement of restoration by community groups etc is not enough to fulfil the Council's obligation to maintain biodiversity under s31(1)(b)(iii). As such, we seek a new objective. The S32 report briefly touches on this issue, in the context of potential vegetation clearance rules outside SNAs (pg 41). It refers to the RPS approach of suggesting non-regulatory methods outside of SNAs. The report also mentions that additional controls on non-SNA indigenous vegetation are included in the overlay chapters for Outstanding Natural Features, Outstanding Natural Landscapes, Special Amenity Landscapes and the Coastal Environment. However, these additional controls are not for the purpose of biodiversity maintenance, and do not refer back to any policy which would allow consideration of this Council function. The rules in the Coastal Environment chapter for example, only consider natural character effects and policies. We seek that additional provisions (an objective, policy and rules) are included in the ECO chapter for the maintenance of biodiversity outside of SNAs. We also seek that the vegetation clearance controls in other chapters refer back to the ECO policy for maintenance of biodiversity. It is not clear what non-regulatory methods have been included in the plan to fulfil this function. In any case, given the biodiversity crisis, non-regulatory measures are not sufficient to meet S31.	Add a new objective to the Ecosystems and Indigenous Biodiversity chapter: <u>ECO-OX</u> <u>The District's indigenous biodiversity is maintained and enhanced.</u>	Accept in part	Yes
Meridian Energy Limited	FS101.117	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	Considers that the objective of maintaining and enhancing indigenous biodiversity at an overall District Scale is appropriate. Enhancement will not be achievable or appropriate in all circumstances however and, consistent with the approach in Objective ECO-O1, the proposed objective would be improved by making it clear that enhancement should occur at the District-wide scale and where appropriate.	Allow / Amend provision to clarify that indigenous biodiversity is to be enhanced overall at District scale and where practicable – for example as follows (or similar wording): 'The District's indigenous biodiversity is maintained and, where appropriate, enhanced'.	Reject	No
Wellington City Council Environmental Reference Group	FS112.25	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Support the position that the SNA provisions applying to residential SNAs must be reinstated from the previous version of the Plan. Reinsert all provisions relating to SNAs in residential zones, from the District Plan draft dated 20 April 2022. Further support amendment to clarify the wider role of the Council maintaining biodiversity wider than SNAs. We support the submission point and need an objective stating the district's biodiversity is maintained and enhanced. Support the need for a new suite of objectives, policies, and rules to provide for protection of wetlands.	Allow	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Royal Forest and Bird Protection Society	345.174	Natural and Environmental Values / Ecosystems and	Amend	Considers it is not clear that the plan adequately provides for the protection of wetlands. In relation to wetlands, the Council has responsibilities in terms of integrated management and the maintenance of biodiversity. This includes responsibilities under the RMA and NPSFM.RPS Policy 61	Add new suite of objectives, policies, and rules to provide for protection of wetlands.	Reject - managed by NES-F regulation 45C	No
Greater Wellington Regional Council	FS84.99	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	Greater Wellington consider that the Proposed District Plan needs to avoid, remedy or mitigate adverse effects of urban development on wetlands in order to give effect to the NPS-FM and have regard to Proposed RPS Change 1.	Allow / Seeks provisions that ensure urban development is located and designed in a way that protects wetlands in accordance with the NPS-FM and proposed RPS Change 1 FW 3.	Reject	No
Director-General of Conservation	FS106.10	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	The reasoning and decision requested by the original submitter is supported.	Allow	Reject	No
Wellington City Council Environmental Reference Group	FS112.26	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Support the position that the SNA provisions applying to residential SNAs must be reinstated from the previous version of the Plan. Reinsert all provisions relating to SNAs in residential zones, from the District Plan draft dated 20 April 2022. Further support amendment to clarify the wider role of the Council maintaining biodiversity wider than SNAs. We support the submission point and need an objective stating the district's biodiversity is maintained and enhanced. Support the need for a new suite of objectives, policies, and rules to provide for protection of wetlands.	Allow	Reject	No
Royal Forest and Bird Protection Society	345.175	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Amend	Considers the plan should include a policy aimed at identification of SNAs. This is important for where new SNAs are identified, for example as part of consenting processes.	Add new policy ECO-PX (<u>Identification of Significant Natural Areas</u>): <u>Identify all areas with significant indigenous biodiversity values and list within SCHED8 and SCHED9, and provide for identification of additional areas with significant biodiversity values.</u>	Accept in part	Yes
Steve West	FS110.5	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	The original submitter seeks to include a new policy aimed at identification of new SNAs and also for maintaining indigenous biodiversity in other areas, suggesting rules to limit removal of indigenous biodiversity in each area to under 200m2 in any 10-year period. Steve West does not support the identification and/or creation of SNAs under the district plan, particularly on private urban land, or provision of other overly restrictive rules (as suggested above) for the following reasons: - Considers that through voluntary conservation programs and effort, the city's indigenous biodiversity (including on private urban land) has increased significantly over the last 20 years. This has occurred without any need for SNAs. - Considers that creating SNAs (and other overly restrictive rules), particularly on private urban land, in the district plan will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner goodwill in the process. And as a result, planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNAs and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules. - Considers that by seeking regulatory outcomes for expanding SNA areas, rather than continuing to encourage and support voluntary conservation efforts there is real risk that indigenous biodiversity gains achieved over the last two decades will diminish over time.	Disallow	Reject	No
Royal Forest and Bird Protection Society	345.176	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Amend	Considers the Plan does not give effect to the Council's obligation to maintain indigenous biodiversity. Considers support for restoration is not sufficient (by way of ECO P4), and therefore seeks a new policy be added. Also seeks that the relevant rules and their matters of discretion in this and other chapters refer back to this new policy.	Add new policy ECO-PX (<u>Maintaining Indigenous Biodiversity</u>): <u>1. To maintain indigenous biodiversity outside of SNAs by avoiding, remedying or mitigating the adverse effects of subdivision, land use and development on indigenous biodiversity.</u> <u>2. To have regard to the following potential adverse effects in considering subdivision, land use and development that may adversely affect indigenous ecosystems and habitats with indigenous biodiversity values:</u> <u>a. Fragmentation of, or reduction in the extent of, indigenous vegetation or habitats of indigenous fauna;</u> <u>b. Fragmentation or disruption of connections and linkages between ecosystems or habitats of indigenous fauna;</u> <u>c. Loss of, or damage to, buffering of ecosystems or habitats of indigenous fauna; and</u> <u>d. Loss or reduction of rare or threatened indigenous species' populations or habitats.</u>	Accept in part	Yes
Greater Wellington Regional Council	FS84.100	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	Greater Wellington agree with the intent of the submission point but not the wording as drafted.	Allow / Support this submission point in part.	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Meridian Energy Limited	FS101.118	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	Considers that the requested additional policy should manage potential adverse effects in accordance with a management hierarchy, as signaled by the exposure draft NPS-Indigenous Biodiversity	Allow / Seeks that if the requested additional policy is included, to ensure that it is amended to manage potential adverse effects on indigenous biodiversity in accordance with an effects management hierarchy that focuses on the indigenous biodiversity values.	Accept	No
Steve West	FS110.6	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	<p>The original submitter seeks to include a new policy aimed at identification of new SNAs and also for maintaining indigenous biodiversity in other areas, suggesting rules to limit removal of indigenous biodiversity in each area to under 200m2 in any 10-year period.</p> <p>Steve West does not support the identification and/or creation of SNAs under the district plan, particularly on private urban land, or provision of other overly restrictive rules (as suggested above) for the following reasons:</p> <ul style="list-style-type: none"> - Considers that through voluntary conservation programs and effort, the city's indigenous biodiversity (including on private urban land) has increased significantly over the last 20 years. This has occurred without any need for SNAs. - Considers that creating SNAs (and other overly restrictive rules), particularly on private urban land, in the district plan will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner goodwill in the process. And as a result, planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNAs and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules. - Considers that by seeking regulatory outcomes for expanding SNA areas, rather than continuing to encourage and support voluntary conservation efforts there is real risk that indigenous biodiversity gains achieved over the last two decades will diminish over time. 	Disallow	Reject	No
Royal Forest and Bird Protection Society	345.177	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Amend	Considers including a policy to deal with the development of existing vacant lots, as was included in the plan version as at 20 April 2022 (attached to this submission), which provided parameters around developing in existing vacant residential sites established prior to the notification of the DP where there is no suitable building platform available outside the SNA. Notes the date would need to be amended to reflect that the SNAs were not included at notification. We would support more protective parameters than those above, to ensure the SNA was protected to the greatest extent possible.	<p>Add new policy ECO-PX (<u>Development of Existing Vacant Lots</u>):</p> <p><u>Provide for the development of existing vacant residential site established prior to the notification of the District Plan where there is no suitable building platform available outside of a Significant Natural Area identified in SCHED8 and SCHED9, having regard to:</u></p> <ol style="list-style-type: none"> <u>1. The location of the building platform and minimizing the extent of associated vegetation removal</u> <u>2. The location of the access or driveway to the building platform to minimize the loss of vegetation or fragmentation of the Significant Natural Area; and</u> <u>3. The location of lateral service connections to public wastewater, sewer and water supply network, electricity and telephone cables.</u> 	Reject	No
Royal Forest and Bird Protection Society	345.178	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Amend	Seeks additional rules to manage vegetation clearance outside SNAs. Considers the plan's provisions do not fulfil Council's requirement to maintain indigenous biodiversity. Regulating activities only in SNAs falls short of this function. This rule would limit permitted indigenous vegetation removal to 200m2 in any 10 year period. Where this PA was not met, it would become RDA, and the matters of discretion would need to reference the new policy aimed at the maintenance of biodiversity. This rule is particularly important given the deletion of the residential SNAs.	Add new rule ECO-RX to manage vegetation clearance outside Significant Natural Areas that permit indigenous vegetation removal to 200m2 in any 10 year period. Where the Permitted activity status is not met, the activity would become a Restricted Discretionary activity, and the matters of discretion would need to reference the new policy aimed at the maintenance of biodiversity.	Accept in part	Yes
Meridian Energy Limited	FS101.119	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	Considers that the requested additional rules would apply to any and all indigenous biodiversity. The proposed limits are unduly restrictive in a rural setting and capture even indigenous vegetation that is planted rather than naturally occurring. The policy needs to give effect to clause (1) (b) of the objective of the exposure draft NPSIndigenous Biodiversity (providing for social, economic wellbeing of people and communities) as well as protecting, maintaining and restoring indigenous biodiversity.	Disallow / Seeks that the requested new rules are disallowed, or if the requested rules are included, to ensure the permitted activity standards provide for the clearance of indigenous vegetation to the extent necessary to maintain existing lawfully established infrastructure, including regionally significant infrastructure.	Reject	No
Steve West	FS110.7	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	<p>The original submitter seeks to include a new policy aimed at identification of new SNAs and also for maintaining indigenous biodiversity in other areas, suggesting rules to limit removal of indigenous biodiversity in each area to under 200m2 in any 10-year period.</p> <p>Steve West does not support the identification and/or creation of SNAs under the district plan, particularly on private urban land, or provision of other overly restrictive rules (as suggested above) for the following reasons:</p> <ul style="list-style-type: none"> - Considers that through voluntary conservation programs and effort, the city's indigenous biodiversity (including on private urban land) has increased significantly over the last 20 years. This has occurred without any need for SNAs. - Considers that creating SNAs (and other overly restrictive rules), particularly on private urban land, in the district plan will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner goodwill in the process. And as a result, planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNAs and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules. - Considers that by seeking regulatory outcomes for expanding SNA areas, rather than continuing to encourage and support voluntary conservation efforts there is real risk that indigenous biodiversity gains achieved over the last two decades will diminish over time. 	Disallow	Reject	No

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Royal Forest and Bird Protection Society	345.179	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Amend	Notes that there is a vegetation clearance rule in the Coastal Environment chapter, which currently only applies in high natural character areas and outside SNAs. As submitted in the Coastal Environment chapter, the vegetation clearance rules should apply everywhere outside SNAs in the coastal environment, not only in high natural character areas, where CES1 is met. We seek a rule that would also have effect outside the coastal environment. Trimming or removal of indigenous vegetation outside SNAs would be permitted if: - to address an imminent threat to people or property provided that a standard is complied with, - for the operation or maintenance of lawfully established buildings, infrastructure, walking cycling or private vehicle access or fences or existing farming activities; and the removal does not exceed 200m2 per title as at notification. A new RDA would apply if those standards were not met.	Add new rule ECO-RX to manage vegetation clearance in all areas of the coastal environment.	Reject	No
Meridian Energy Limited	FS101.120	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	Considers that the requested additional rules would apply to any and all indigenous biodiversity. The proposed limits are unduly restrictive in a rural setting and capture even indigenous vegetation that is planted rather than naturally occurring. The policy needs to give effect to clause (1) (b) of the objective of the exposure draft NPS Indigenous Biodiversity (providing for social, economic wellbeing of people and communities) as well as protecting, maintaining and restoring indigenous biodiversity.	Disallow / Seeks that the requested new rules are disallowed, or if the requested rules are included, to ensure the permitted activity standards provide for the clearance of indigenous vegetation to the extent necessary to maintain existing lawfully established infrastructure, including regionally significant infrastructure.	Accept	No
Royal Forest and Bird Protection Society	345.180	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Amend	We seek a rule that would also have effect outside the coastal environment. Trimming or removal of indigenous vegetation outside SNAs would be permitted if: - to address an imminent threat to people or property provided that a standard is complied with, - for the operation or maintenance of lawfully established buildings, infrastructure, walking cycling or private vehicle access or fences or existing farming activities; and the removal does not exceed 200m2 per title as at notification. A new RDA would apply if those standards were not met.	Add new rule ECO-RX to manage vegetation clearance outside Significant Natural Areas, with Permitted activity standards requiring the activity to: - address an imminent threat to people or property provided that a standard is complied with, - before the operation or maintenance of lawfully established buildings, infrastructure, walking cycling or private vehicle access or fences or existing farming activities; and the removal does not exceed 200m2 per title as at notification. Non-compliance with Permitted activity standards would default to a Restricted Discretionary activity.	Accept in part	Yes
Transpower New Zealand Limited	FS29.36	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	Considers that on the basis SNA's are identified in the PDP (and have been comprehensively addressed) Transpower does not support the provision of a blanket rule to apply to all indigenous vegetation. While Transpower agrees that indigenous vegetation outside an SNA has value, given the significant planning implications of imposing a rule to apply outside an SNA, a robust S32AA analysis is required as to the alternatives, cost and benefits, effectiveness and efficiency, risks and then a decision made about the most appropriate action. There is no higher order support for such a rule. The PDP gives effect to Objective 16 and Policies 23 and 24 of the RPS and Section 6(c) of the RMA is confined to significant indigenous vegetation. Given the robustness of the process in determining the SNAs (notwithstanding the Council decision to not notify SNA within urban area), the inclusion of a plan wide rule is not the most efficient and effective way in which to give effect to the objectives of the PDP or the higher order RPS.	Disallow	Reject	No
Meridian Energy Limited	FS101.121	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	Considers that the requested additional rules would apply to any and all indigenous biodiversity. The proposed limits are unduly restrictive in a rural setting and capture even indigenous vegetation that is planted rather than naturally occurring. The policy needs to give effect to clause (1) (b) of the objective of the exposure draft NPS Indigenous Biodiversity (providing for social, economic wellbeing of people and communities) as well as protecting, maintaining and restoring indigenous biodiversity.	Disallow / Seeks that the requested new rules are disallowed, or if the requested rules are included, to ensure the permitted activity standards provide for the clearance of indigenous vegetation to the extent necessary to maintain existing lawfully established infrastructure, including regionally significant infrastructure.	Reject	No
Royal Forest and Bird Protection Society	345.181	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Amend	Considers that it is appropriate to include standards for residential SNA's in line with those in the Draft Plan.	Reinstate the Draft Plan's ECO standards for residential Significant Natural Areas.	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Steve West	FS110.4	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	<p>Disagree that reinstatement of residential SNAs in the Proposed District Plan is required for WCC to meet its obligations under section 6(c) of the RMA and policies 23/24 of the Regional Policy Statement for the following reasons:</p> <ul style="list-style-type: none"> - Neither the RMA or RPS prescribe in detail how a council might give effect to the requirement to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna. On note, in the 2015 Environment Court case between Forrest & Bird and New Plymouth District Council the Environment Court concluded Councils might conceivably meet RMA Section 6(c) duties through methods other than identification and rules, but in this case the non-regulatory methods relied on by the Council were insufficient to provide protection. - Alternative methods of compliance are available to WCC. - Indigenous biodiversity in Wellington (including on private urban land) has increased significantly over the last 20 years, including Zealandia and Predator Free, along with voluntary conservation efforts without any need for SNAs. - Creating SNAs on private urban land will turn native bush into an expensive and unwanted burden for many private urban landowners, destroying landowner value and goodwill in the process. Real risk that indigenous biodiversity gains achieved over the last two decades will diminish should SNAs be created on private urban land, and as a result would see both GWRC and WCC failing to meet their regulatory obligations, including under the RMA. - Specifically for Captain Edward Daniell Drive, indigenous biodiversity is already protected under Section 3 of the Land Covenant registered on the records of title. <p>Considers that as the NPSIB is in draft form and has no legal effect, and given how unpopular SNAs proved to be in submissions on the draft district plan, pushing on with creating SNA on private urban land before the policy statement is in effect would further undermine WCC's already poor relationship with impacted landowners. [Refer to further submission for full reason]</p>	Disallow / Seeks that part of submission be disallowed and that already protected land (such as Captain Edward Dainell Drive) be removed from Schedule 9, should residential SNAs be reinstated.	Accept	No
Royal Forest and Bird Protection Society	345.182	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support in part	It is not clear how these policies are given effect to in the rules. Seeking (in the ECO chapter) a general indigenous vegetation clearance rule, outside of SNAs. Seek that this is applied in the rural zone, in order to maintain biodiversity.	Add new rule ECO-RX to manage indigenous vegetation clearance outside of Significant Natural Areas to maintain biodiversity.	Accept	Yes
Transpower New Zealand Limited	FS29.37	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	<p>Considers that on the basis SNA's are identified in the PDP (and have been comprehensively addressed) Transpower does not support the provision of a blanket rule to apply to all indigenous vegetation. While Transpower agrees that indigenous vegetation outside an SNA has value, given the significant planning implications of imposing a rule to apply outside an SNA, a robust S32AA analysis is required as to the alternatives, cost and benefits, effectiveness and efficiency, risks and then a decision made about the most appropriate action. There is no higher order support for such a rule. The PDP gives effect to Objective 16 and Policies 23 and 24 of the RPS and Section 6(c) of the RMA is confined to significant indigenous vegetation. Given the robustness of the process in determining the SNAs (notwithstanding the Council decision to not notify SNA within urban area), the inclusion of a plan wide rule is not the most efficient and effective way in which to give effect to the objectives of the PDP or the higher order RPS.</p>	Disallow	Reject	No
Meridian Energy Limited	FS101.122	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	<p>Considers that the requested additional rules would apply to any and all indigenous biodiversity. The proposed limits are unduly restrictive in a rural setting and capture even indigenous vegetation that is planted rather than naturally occurring. The policy needs to give effect to clause (1) (b) of the objective of the exposure draft NPS Indigenous Biodiversity (providing for social, economic wellbeing of people and communities) as well as protecting, maintaining and restoring indigenous biodiversity.</p>	Disallow / Seeks that the requested new rules are disallowed, or if the requested rules are included, to ensure the permitted activity standards provide for the clearance of indigenous vegetation to the extent necessary to maintain existing lawfully established infrastructure, including regionally significant infrastructure.	Reject	No
Greater Wellington Regional Council	351.150	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	<p>Considers that WCC has stated that wetlands are sufficiently covered by the National Environmental Standards for Freshwater 2020, the submitter does not support this view and considers that the PDP has a role for integrated management of adverse effects on wetlands and their functions, including those wetlands not yet identified, under NPS-FM Clause 3.5.</p> <p>Under NPS-FM Section 3.5 the PDP should contribute to the protection and enhancement of the health and well-being of water bodies and freshwater ecosystems, including wetlands, through WCC's RMA section 31 functions, as outlined in Policies FW.3 and FW.6 of Proposed RPS Change 1. This approach would help to achieve NPS-FM Policies 6 and 7 and operative RPS policy 47.</p> <p>The PDP should provide for identification and avoidance of waterways (both within and outside of SNAs) during structure planning and sub-division, such that waterways must be identified and protected prior to any development occurring. Greater Wellington does not consider the freshwater direction in the design guides to provide sufficient certainty of protection and enhancement.</p>	Add a policy and objective to protect and enhance the health and well-being of water bodies and freshwater ecosystems, including wetlands, in the ECO chapter. This should lead into rules in the subdivision and future urban zone chapters, requiring that waterways and wetlands have been identified for structure planning or subdivision prior to any development occurring.	Reject	No
Director-General of Conservation	385.35	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Not specified	<p>Considers that Policy 8 of the NPS-IB exposure draft seeks that "The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for".</p> <p>Given the NPS-IB is anticipated to be gazetted in December 2022, the Director-General submits that the Proposed District Plan should give effect to this national direction.</p>	Add policy to require the protection of indigenous biodiversity outside of SNAs.	Accept in part	Yes

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Transpower New Zealand Limited	FS29.2	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	Until such time as the NPS-IB is gazetted, Transpower does not support the provision of policies to give effect to the NPS.	Disallow	Reject	No
Royal Forest and Bird Protection Society of New Zealand Inc	FS85.1	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	Given the NPS-IB is anticipated to be gazetted in December 2022, Forest & Bird agrees that the Proposed District Plan should give effect to this national direction.	Allow	Accept in part	No
Kāinga Ora – Homes and Communities	FS89.53	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	Further clarification is needed to understand the implications on land use opportunities of applying significant natural areas.	Disallow	Reject	No
Meridian Energy Limited	FS101.123	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	Considers that the requested policy should manage potential adverse effects in accordance with a management hierarchy, as signaled by the exposure draft NPS-Indigenous Biodiversity.	Amend / Seeks that if the additional policy is included, to ensure it is amended to manage potential adverse effects on indigenous biodiversity in accordance with an effects management hierarchy that focuses on the indigenous biodiversity values.	Accept in part	No
Director-General of Conservation	385.36	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Amend	<p>Considers addition of setback standard within the chapter.</p> <p>Under the current standards, there is no setback requirement from a Significant Natural Area (SNA) which means development could be located directly against the boundary of a SNA. Adverse effects resulting from development within proximity to an SNA include bright lights impacting indigenous fauna and people trimming/removing vegetation/trees from an SNA for being too close to their property. The provision of a buffer or setback between new development and SNAs will reduce the possibility of adverse effects and allow the consideration of effects/mitigation at resource consent stage if new development is proposed within the setback.</p> <p>Additionally, the addition of a development setback for SNAs would ensure the Proposed District Plan is in line with Policy 47, specifically point b, of the RPS.</p>	Add standard which would manage development setbacks as follows: New buildings, building additions, structures, and swimming pools shall be setback 5m from the boundary of a Significant Natural Area.	Reject	No
Greater Wellington Regional Council	FS84.15	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	Greater Wellington support the proposed setback provisions as one method to protect SNAs from the adverse effects of intensification.	Allow	Reject	No
Kāinga Ora – Homes and Communities	FS89.54	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Oppose	Kainga Ora does not support the proposed change requested and considers it is unnecessary to manage identified values.	Disallow	Accept	No
Meridian Energy Limited	FS101.124	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	Considers that there may be circumstances where a 5m setback is not achievable due to legitimate functional or operational needs of infrastructure.	Amend / Seeks that if the requested standard is included, to ensure that there is provision for reduction of the setback distance where necessary to provide for existing lawfully established infrastructure and where functional or operational needs mean it is not practicable to achieve or maintain a 5m setback.	Reject	No
Wellington City Council Environmental Reference Group	FS112.28	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / New ECO	Support	Agree with the Director-General of Conservation to include a set-back standard where a development is adjacent to an SNA. This buffer provision will reduce the possibility of adverse effects by allowing consideration of effects/mitigation at resource consent stage. It also brings the Proposed District Plan in line with Policy 47, specifically point b, of the RPS.	Allow	Reject	No
Transpower New Zealand Limited	315.162	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Support	Supports the introductory text which clarifies that provisions specific to infrastructure are addressed in the infrastructure chapter.	Retain the Introduction to the Ecosystems and Indigenous Biodiversity chapter as notified.	Accept in part	No

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Tyers Stream Group	221.32	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Amend	[No specific reason given beyond decision requested - refer to original submission]	Amend ECO-01 (Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored) as follows: Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored.	Reject	No
Meridian Energy Limited	FS101.125	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Oppose	Considers that Part 2 of the RMA intends that significant natural areas should be protected from inappropriate subdivision, use and development.	Disallow	Accept	No
Meridian Energy Limited	228.68	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Support in part	Considers that it is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Retain Objective ECO-01 (Significant natural areas are protected from inappropriate subdivision, use and development, and where appropriate, restored) with amendment.	Reject	No
Meridian Energy Limited	228.69	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Amend	Considers that it is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Amend Objective ECO-01 (Significant natural areas are protected from inappropriate subdivision, use and development, and where appropriate, restored) as follows: <u>The ecological and indigenous biodiversity values of Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored.</u>	Reject	No
Wellington Electricity Lines Limited (WELL)	FS27.7	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Support	WELL agree in principle with the submitter that it is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy. In this regard, WELL consider that the sought amendment to ECO-01 is appropriate and therefore is supported.	Allow	Accept	No
Kilmarston Developments Limited and Kilmarston Properties Limited	290.34	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Support in part	Considers that It is important that Council identified SNAs within the City in order to protect and maintain the remaining areas of indigenous biodiversity. However, this should not include areas earmarked for public access and roads. The Submitter accepts the overlay being clipped to the proposed MRZ areas of their land, but not over the paper road and parts of the access.	Retain ECO-01 (Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored) as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.183	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Support in part	Notes that Section 6(c) does not include reference to 'inappropriate subdivision, use and development'.	Amend ECO-01 as follows: Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored.	Reject	No
Meridian Energy Limited	FS101.126	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Oppose	Considers that the scheme of the RMA is that significant natural areas should be protected from inappropriate subdivision, use and development.	Disallow	Reject	No
WCC Environmental Reference Group	377.116	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Amend	Considers that it is crucial that SNAs are protected, as is required by law. By rephrasing this objective, it puts the emphasis on restoration as the default position, rather than a possible option. It is thought that this strikes the balance better between use and protection	Amend the wording "where appropriate) from ECO-01 (Significant Natural Areas are protected from inappropriate subdivision, use...) to "where possible"	Reject	No
Meridian Energy Limited	FS101.127	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Oppose	Considers that restoration in all circumstances 'where possible' creates an unduly stringent requirement. Evaluation of what is 'appropriate' better gives effect to the exposure draft NPS-Indigenous Biodiversity objective, including providing for the social and economic wellbeing of people and communities and enabling consideration of the merit or restoring specific indigenous biodiversity resources.	Disallow	Reject	No
Director-General of Conservation	385.37	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Oppose in part	Considers that as the objectives (ECO-01 and ECO-02) are seeking the same outcome, they should be incorporated into one objective.	Opposes ECO-01 in its current form and seeks amendment.	Accept	No
Director-General of Conservation	385.38	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Amend	The Director-General is supportive of the intention of Objective ECO-01 & ECO-02, however considers that as the objectives are seeking the same outcome, they should be incorporated into one objective. The suggested wording is in line with the NZCPS including Policy 7 which provides protection from inappropriate subdivision, use, and development in these areas through objectives and Policy 14 which promotes restoration or rehabilitation of the natural character of the coastal environment.	Amend Objective ECO-01 as follows: "Significant Natural Areas (including those within the coastal environment) are protected from inappropriate subdivision, use and development and where appropriate, restored <u>or rehabilitated</u> ."	Accept in part	Yes

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Te Rūnanga o Toa Rangatira	488.49	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Support in part	Supports that the objective says that significant natural areas are protected from inappropriate land use	Retain ECO-01 (Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored) with amendment below.	Accept	No
Te Rūnanga o Toa Rangatira	488.50	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-01	Amend	Considers the objective should mention protection from adverse effects of incompatible activities.	Amend Ecosystems and Indigenous Biodiversity Objective 1 (Protection of significant natural areas) to mention protection from adverse effects of incompatible activities.	Reject	No
Victoria University of Wellington Students' Association	123.39	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Not specified	Considers that ECO-02 (Significant Natural Areas within the coastal environment are protected.) supports the restriction of building activities around the coast. Section 6(a) of the RMA identifies the protection of the natural character of the coastal environment from inappropriate subdivision, use, and development as a matter of national importance.	Seeks that building activities around the coast are restricted to protect biodiversity, natural character, and amenity values.	Accept in part	No
Victoria University of Wellington Students' Association	123.40	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Support	Considers that ECO-02 (Significant Natural Areas within the coastal environment are protected.) supports the restriction of building activities around the coast.	Seeks that building activities around the coast, and any expansion of the city including airport runway extensions, acknowledge the large range of indigenous birds nesting around the Pōneke Wellington coastline.	Accept in part	No
Tyers Stream Group	221.33	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-02 (Significant Natural Areas within the coastal environment are protected) as notified.	Reject	No
Meridian Energy Limited	228.70	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Support in part	Considers that it is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Retain Objective ECO-02 (Significant natural areas within the coastal environment) with amendment.	Reject	No
Meridian Energy Limited	228.71	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Amend	Considers that it is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Amend Objective ECO-02 (Significant natural areas within the coastal environment) as follows: <u>The ecological and indigenous biodiversity values of Significant Natural Areas within the coastal environment are protected.</u>	Reject	No
Kilmarston Developments Limited and Kilmarston Properties Limited	290.35	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Support in part	Considers that It is important that Council identified SNAs within the City in order to protect and maintain the remaining areas of indigenous biodiversity. However, this should not include areas earmarked for public access and roads. The Submitter accepts the overlay being clipped to the proposed MRZ areas of their land, but not over the paper road and parts of the access.	Retain ECO-02 (Significant Natural Areas within the coastal environment are protected) as notified.	Reject	No
Royal Forest and Bird Protection Society	345.184	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Support	Generally supports ECO-02.	Retain ECO-02 as notified.	Reject	No
Greater Wellington Regional Council	351.151	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Amend	Considers that the wording used for the coastal environment should differ from that in ECO-01.	Seeks to amend wording to 'protected and, where appropriate, restored' or remove the objective.	Accept in part	No
Meridian Energy Limited	FS101.128	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Support	Meridian supports the proposed wording, which includes 'where appropriate, restored'.	Amend / Allow the requested amendment, provided it includes the words 'and, where appropriate, restored'.	Accept	No
WCC Environmental Reference Group	377.117	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Support	ECO-02 is supported as it is vital to ensuring SNAs are protected.	Retain ECO-02 (Significant Natural Areas within the coastal environment are protected). As notified.	Reject	No
Director-General of Conservation	385.39	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-02	Oppose in part	Considers that as the objectives (ECO-01 and ECO-02) are seeking the same outcome, they should be incorporated into one objective.	Delete objective ECO-02 in its entirety, on the grounds that ECO-01 is amended.	Accept	Yes

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Tyers Stream Group	221.34	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O3	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-O3 (Significant Natural Areas are protected from the adverse effects of plantation forestry activities) as notified.	Accept	No
Kilmarston Developments Limited and Kilmarston Properties Limited	290.36	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O3	Support in part	Considers that It is important that Council identified SNAs within the City in order to protect and maintain the remaining areas of indigenous biodiversity. However, this should not include areas earmarked for public access and roads. The Submitter accepts the overlay being clipped to the proposed MRZ areas of their land, but not over the paper road and parts of the access.	Retain ECO-O3 (Significant Natural Areas are protected from the adverse effects of plantation forestry activities) as notified.	Accept	No
Royal Forest and Bird Protection Society	345.185	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O3	Support	Generally supports ECO-O3.	Retain ECO-O3 as notified.	Accept	No
WCC Environmental Reference Group	377.118	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O3	Support	ECO-O3 is supported as it is vital to ensuring SNAs are protected.	Retain ECO-O3 (Significant Natural Areas are protected from the adverse effects of plantation forestry activities) as notified.	Accept	No
Te Rūnanga o Toa Rangatira	488.51	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O3	Support in part	Supports mention of protection from the effects of plantation forestry.	Retain ECO-O3 (Significant Natural Areas are protected from the adverse effects of plantation forestry activities.) as notified.	Accept	No
Tyers Stream Group	221.35	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O4	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-O4 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as notified.	Accept	No
Kilmarston Developments Limited and Kilmarston Properties Limited	290.37	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O4	Support in part	Considers that It is important that Council identified SNAs within the City in order to protect and maintain the remaining areas of indigenous biodiversity. However, this should not include areas earmarked for public access and roads. The Submitter accepts the overlay being clipped to the proposed MRZ areas of their land, but not over the paper road and parts of the access.	Retain ECO-O4 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as notified.	Accept	No
Royal Forest and Bird Protection Society	345.186	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O4	Support	Generally supports ECO-O4.	Retain ECO-O4 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as notified.	Accept	No
Greater Wellington Regional Council	351.152	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O4	Amend	Considers that the wording, 'maintain and restore' is inconsistent with 'protect and restore' in ECO-O1 and the related policy ECO-P4.	Seeks to amend wording in ECO-O4 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) to 'protect and restore'.	Reject	No
WCC Environmental Reference Group	377.119	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-O4	Support	Supports as the objective is vital to ensuring SNAs are protected. Particularly supports ECO-O4 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as it further Wellington City Council's Te Tiriti obligations.	Retain ECO-O4 (Significant Natural Areas are maintained or restored by mana whenua in accordance with kaitiakitanga) as notified.	Accept	No
Tyers Stream Group	221.36	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P1 (Protection of significant natural areas) as notified.	Accept in part	No
Meridian Energy Limited	228.72	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose in part	Considers that the mitigation hierarchy created by Policy ECO-P1 (Protection of significant natural areas) should focus biodiversity and compensation initiatives at adverse effects that are more than minor (not all residual adverse effects). Considers the word 'only' in clauses 4 and 5 is unnecessary because the circumstances when biodiversity offsetting and biodiversity compensation will be considered are set out in APP2 (Biodiversity offsetting) and APP3 (Biodiversity compensation). Considers the word 'only' adds no value to the principles in APP2 and APP3.	Retain Policy ECO-P1 (Protection of significant natural areas) with amendment.	Accept in part	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Meridian Energy Limited	228.73	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Amend	<p>Considers that the mitigation hierarchy created by Policy ECO-P1 (Protection of significant natural areas) should focus biodiversity and compensation initiatives at adverse effects that are more than minor (not all residual adverse effects).</p> <p>Considers the word 'only' in clauses 4 and 5 is unnecessary because the circumstances when biodiversity offsetting and biodiversity compensation will be considered are set out in APP2 (Biodiversity offsetting) and APP3 (Biodiversity compensation). Considers the word 'only' adds no value to the principles in APP2 and APP3.</p>	<p>Amend Policy ECO-P1 (Protection of significant natural areas) as follows:</p> <p>Protect the biodiversity values of the identified significant natural areas within SCHED8 by requiring subdivision, use and development to:</p> <ol style="list-style-type: none"> 1. Avoid adverse effects on indigenous biodiversity values where practicable; 2. Minimise adverse effects on the biodiversity values where avoidance is not practicable; 3. <u>Where practicable, remedy</u> adverse effects on the biodiversity values where they cannot be avoided or minimised; 4. <u>Where residual adverse effects cannot be avoided, mitigated or remedied, Only</u> consider biodiversity offsetting for any residual adverse effects that are more than minor cannot otherwise be avoided, minimised or remedied and where the principles of APP2 – Biodiversity Offsetting are met; and 5. <u>Only if biodiversity offsetting of more than minor residual adverse effects is not practicable,</u> consider biodiversity compensation after first considering biodiversity offsetting and where the principles of APP3 – Biodiversity Compensation are met. 	Accept in part	Yes
Horokiwi Quarries Ltd	271.22	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Support	<p>Supports ECO-P1 as it reflects the common mitigation hierarchy approach to biodiversity. Depending on the identification of specific SNA areas, Horokiwi is not opposed to the policy. The references to 'where practicable' and ability for offsetting are supported.</p>	Retain ECO-P1 (Protection of significant natural areas) as notified.	Accept in part	No
Aggregate and Quarry Association	303.14	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Support	<p>ECO-P1 is supported as it provides for an effects management hierarchy for land development, including offsetting and compensation, within Significant Natural Areas.</p>	Retain ECO-P1 (Protection of significant natural areas) as notified.	Accept in part	No
Transpower New Zealand Limited	315.163	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Support	<p>Considers policy INF-ECO-P36 and P37 requires application of the effects management hierarchy (which is incorrectly referenced as ECO-P2 within the aforementioned policies) to the upgrade and development of the National Grid. Submitter notes that in its comments on INF-ECO-P36 and P37 deletion of the cross reference to Policy ECO-P1 is sought.</p> <p>Submitter is not opposed to ECO-P1 (and is supportive of the mitigation hierarchy approach within ECO-P1 on the basis biodiversity offsets and compensation are only a consideration as opposed to a mandatory requirement). However, given the uncertainty as to what form ECO-P1 will take and the significant implications of any policy changes to policy ECO-P1 to the National Grid, Transpower seeks to include Significant Natural Areas within the 'seek to avoid' policy directive of the sought National Grid specific policies, as opposed to being subject to ECO-P1. By deleting the ECO specific clause within INF-ECO-P36 and P37, the policy directive would be to 'seek to avoid' the SNA's as applying to the National Grid. Considers this would be the most efficient and effective solution in respect of the NPS-ET. While NPS-ET Policy 8 does not specifically reference indigenous biodiversity, given the high value of the areas within the policy, considers it would be consistent to include SNA's within the sought "seek to avoid" policy directive. Considers the inclusion would be consistent for the intent of the NPS-ET to provide a comprehensive enabling regime for the National Grid recognising its national significance, and for the 'seek to avoid' policy to address RMA section 6 matters in a consistent manner. Considers policies 1-5 of the NPS-ET require some tempering of plan provisions that may otherwise be applied to the National Grid, in order to provide for the need to operate, maintain, develop and upgrade the electricity transmission network as a matter of national significance.</p>	Retain Policy ECO-P1 (Protection of significant natural areas) as notified, subject to deletion of reference to the policy within INF-ECO-P36 and INF-ECO-P37.	Accept in part	No
Royal Forest and Bird		Natural and	Support	<p>Considers this policy needs to be limited to situations where policy 11 NZCPS does not apply. The</p>	Amend ECO-P1 (Protection of significant natural areas):	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Protection Society	345.187	Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1		<p>Auckland Unitary Plan provides an example of how this can be achieved. It is currently not clear that ECO-P5 would apply as a first step in the coastal environment. As such, a specific clause is required. The SNA provisions should apply to any area of significant biodiversity that meets the Policy 23 RPS criteria. There may be areas that have been missed in the scheduling process, and could be discovered for example via the consenting process. In order to meet the requirements of the Act, the SNA provisions must also apply to these areas. The SNA provisions also need to apply to the deleted SCHED9 areas. This can be achieved by either:</p> <ul style="list-style-type: none"> - Amending the SNA definition as sought above to incorporate SCHED 8, SCHED9, and any other area that meets the Policy 23 RPS criteria, and simply referring to the defined term in the provisions (as opposed to the current approach, which specifically references SCHED8 repeatedly) (preferred option); or - Amending every provision in the Plan that refers to SCHED8, to also refer to SCHED9 and any area that meets Policy 23 RPS criteria. <p>The effects management hierarchy in ECO-P1 only requires for avoidance of effects where practicable. That low standard is not sufficient to ensure the requirements of the Act (including s6 and s31) are met. Some effects must actually be avoided in order to meet these requirements. We seek changes to meet these requirements. We note that the recent PC18 to the Porirua DP includes such limits.</p> <p>We note that this policy applies to subdivision. Please see our submission points on the Subdivision chapter.</p> <p>The effects management hierarchy in this policy uses the term "minimised" rather than the RMA term "mitigated". The term mitigation comes directly from s 5 RMA. There is extensive jurisprudence on what it means and how it sits within the RMA's system alongside avoidance and remediation for managing adverse effects of activities. Conversely, the term "minimise" is not in s 5 RMA. This raises a question of the vires of substituting mitigate for minimise.</p> <p>Continued use of mitigate, alongside avoidance and remediation, will preserve case law and</p>	<p>Protect the biodiversity values of the identified significant natural areas within SCHED8 by requiring subdivision, use and development to:</p> <ol style="list-style-type: none"> 1. Avoid adverse effects on indigenous biodiversity in the coastal environment to the extent stated in ECO P5; 2. Avoid the following adverse effects on indigenous biodiversity values: <ol style="list-style-type: none"> a. Loss of ecosystem representation and extent; b. Disruption to sequences, mosaics or ecosystem function; c. Fragmentation or loss of buffering or connectivity within the SNA and between other indigenous habitats and ecosystems; and d. A reduction in population size or occupancy of threatened species using the SNA for any part of their life cycle. 3. Avoid other adverse effects on indigenous biodiversity values where practicable 4. Minimise Mitigate adverse effects on the biodiversity values where avoidance is not practicable; 5. Remedy adverse effects on the biodiversity values where they cannot be avoided or mitigated minimised; 6. Only consider biodiversity offsetting for any residual adverse effects that cannot otherwise be avoided, mitigated minimised or remedied and where the principles of APP2 – Biodiversity Offsetting are met; and 7. Only consider biodiversity compensation after first considering biodiversity offsetting and where the principles of APP3 – Biodiversity Compensation are met. 		
Meridian Energy Limited	FS101.129	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose	The proposed amendment conflicts, in part, with the amendments Meridian seeks to policy ECO-P1.	Disallow / Allow the amendments only to the extent that they align with the amendments requested by Meridian in its submission point 228.73.		
Greater Wellington Regional Council	351.153	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Amend	The wording 'where practicable' is unnecessary in clause 1 as it is restated in clause 2.	Seeks to amend wording to remove 'where practicable' from clause 1.	Accept in part	Yes
Meridian Energy Limited	FS101.130	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose	Considers that the deletion of 'where practicable' from clause 1 would not give effect to the objective of the NPS Indigenous Biodiversity (it would fail to consider clause (1) (b)). The words 'where practicable' in clause 2 of Policy ECO-P1 address the subsequent step in the hierarchy (not the first 'avoid' step).	Disallow	Reject	No
WCC Environmental Reference Group	377.120	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Amend	In relation to Point 3, the submitter considers that environmental damage cannot be remedied in a way that is different to biodiversity offsetting.	Amend Point 3 of ECO-P1 (Protection of significant natural areas) to be clearer as to how remedying may exist, or remove entirely.	Reject	No
Meridian Energy Limited	FS101.131	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose	Considers that it is relevant to include 'remediation' in the mitigation hierarchy, even if it is unlikely to be employed in most cases. Biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions.	Disallow	Accept	No
The Retirement Villages Association of New Zealand Incorporated	FS126.216	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose	The RVA opposes this submission point as the current policy provides an appropriate hierarchy for avoiding, minimising, remedying, offsetting and compensating for biodiversity values. Compensation is an appropriate mechanism to be considered that can lead to enhanced biodiversity outcomes	Disallow	Accept	No
Ryman Healthcare Limited	FS128.216	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose	Ryman opposes this submission point as the current policy provides an appropriate hierarchy for avoiding, minimising, remedying, offsetting and compensating for biodiversity values. Compensation is an appropriate mechanism to be considered that can lead to enhanced biodiversity outcomes	Disallow	Accept	No
WCC Environmental Reference Group	377.121	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Amend	Considers that biodiversity compensation should not be available. It should not be possible for destruction of biodiversity to be available at a price.	Remove Point 5, biodiversity compensation, of ECO-P1 (Protection of significant natural areas) in its entirety.	Reject	No

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Meridian Energy Limited	FS101.132	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose	Considers that it is relevant to include 'remediation' in the mitigation hierarchy, even if it is unlikely to be employed in most cases. Biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions.	Disallow	Accept	No
The Retirement Villages Association of New Zealand Incorporated	FS126.217	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose	The RVA opposes this submission point as the current policy provides an appropriate hierarchy for avoiding, minimising, remedying, offsetting and compensating for biodiversity values. Compensation is an appropriate mechanism to be considered that can lead to enhanced biodiversity outcomes	Disallow	Accept	No
Ryman Healthcare Limited	FS128.217	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose	Ryman opposes this submission point as the current policy provides an appropriate hierarchy for avoiding, minimising, remedying, offsetting and compensating for biodiversity values. Compensation is an appropriate mechanism to be considered that can lead to enhanced biodiversity outcomes	Disallow	Accept	No
Director-General of Conservation	385.40	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Oppose in part	Considers that the use of policy that implements an effects management hierarchy is supported, provided that, Policy ECO-P1 is amended to be in line with the wording in the exposure draft for the National Policy Statement on Indigenous Biodiversity.	Opposes in part ECO-P1 (Protection of significant natural areas), in its current form and seeks amendment.	Accept	Yes
Director-General of Conservation	385.41	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Amend	Considers that the use of policy that implements an effects management hierarchy is supported, provided that, Policy ECO-P1 is amended to be in line with the wording in the exposure draft for the National Policy Statement on Indigenous Biodiversity.	Amend Policy ECO-P1 (Protection of significant natural areas) to be in line with the wording set out in the exposure draft for the National Policy Statement on Indigenous Biodiversity.	Accept	Yes
Meridian Energy Limited	FS101.133	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Support	Meridian agrees that any amendments to the wording of ECO objectives and policies must be aligned with the NPS-Indigenous Biodiversity once that is gazetted. The issue will be in the timing of the Plan hearings/decisions and gazettal of the NPS.	Allow	Accept	Yes
Paul M Blaschke	435.8	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P1	Support	ECO-P1 is particularly supported.	Retain ECO-P1 (Protection of significant natural areas) as notified.	Accept in part	No
Tyers Stream Group	221.37	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P2 (Appropriate vegetation removal in significant natural areas) as notified.	Accept in part	No
Meridian Energy Limited	228.74	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Support in part	Considers that the removal of vegetation may also be appropriate where necessary to provide for the functional or operational needs of regionally significant infrastructure, including vegetation removal from around structures.	Retain Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) with amendment.	Accept in part	No
Meridian Energy Limited	228.75	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Amend	Considers that the removal of vegetation may also be appropriate where necessary to provide for the functional or operational needs of regionally significant infrastructure, including vegetation removal from around structures.	Amend Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) as follows (or similar to provide for the functional and operational needs of regionally significant infrastructure): Enable vegetation removal within significant natural areas identified within SCHED8 where it is of a scale and nature that maintains the biodiversity values, including to provide for: 1. Maintenance around existing buildings <u>and structures</u> ; or 2. Safe operation of roads, tracks and access ways; or 3. <u>Functional or operational needs in operating, maintaining, repairing, or upgrading regionally significant infrastructure</u> ; or 4. ...	Accept in part	No
Wellington Electricity Lines Limited (WELL)	FS27.8	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Support	WELL support the submission point in that the removal of vegetation may also be appropriate where necessary to provide for the functional or operational needs of regionally significant infrastructure. WELL is guided by the Electricity (Hazards from Trees) Regulations 2003, and therefore consider that the submission point to amend Policy ECO-P2 so as to allow appropriate vegetation removal in SNA areas is appropriate for the safe and secure supply of electricity.	Allow	Accept	No
Director-General of Conservation	FS106.11	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Oppose	Infrastructure in relation to SNAs is detailed under the "Infrastructure – Ecosystems and Indigenous Biodiversity" chapter of the PDP. To avoid confusion, it should continue to be included in a separate chapter and not referenced in the "Ecosystems and Indigenous Biodiversity" chapter.	Disallow	Reject	No

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Fire and Emergency New Zealand	273.102	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Support	Supports the policy as it enables the removal of vegetation within significant natural areas to reduce wildfire risk through the removal of highly flammable vegetation near existing residential units or on rural property	Retain ECO-P2 (appropriate vegetation removal in significant natural areas) as notified.	Accept in part	No
Aggregate and Quarry Association	303.15	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Amend	Considers that ECO-P2 is unlikely to apply to quarrying activities. Adding a point that enables vegetation clearance where the existing activity is a legal activity will achieve the right balance between protection of appropriate vegetation and allowing essential economic activities.	Amend ECO-P2 (Appropriate vegetation removal in significant natural areas) to add a sub-point enabling vegetation clearance where the existing activity is a legal activity.	Accept in part	Yes
Director-General of Conservation	FS106.12	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Oppose	It is unclear what the submitter considers to be a legal activity. However, if an activity is able to take place by an approved resource consent, by being a Permitted Activity, or by having existing use rights, then the activity is already able to go ahead, and this wording is therefore not necessary in the PDP. If the proposed vegetation clearance is not enabled by one of the points above, it should be considered separately under the District Plan and not enabled.	Disallow	Accept	No
Transpower New Zealand Limited	315.164	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Not specified	Considers that, on the basis ECO-P2 is not applicable to Infrastructure, Transpower is neutral on the policy. However, if the intent is that it does and should apply to the National Grid, seeks amendment to recognise vegetation removal to enable the safe and efficient operation and maintenance of the National Grid. [position is specified as neutral]	Retain Policy ECO-P2 (Appropriate vegetation removal in significant natural areas). [Subject to amendment if the intent is that the policy applies to the National Grid]	Accept in part	No
Transpower New Zealand Limited	315.165	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Not specified	Considers that, on the basis ECO-P2 is not applicable to Infrastructure, Transpower is neutral on the policy. However, if the intent is that it does and should apply to the National Grid, seeks amendment to recognise vegetation removal to enable the safe and efficient operation and maintenance of the National Grid. [position is specified as neutral]	Seeks that if the intent is that Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) applies to the National Grid, it is amended to recognise vegetation removal to enable the safe and efficient operation and maintenance of the National Grid.	Accept in part	No
Royal Forest and Bird Protection Society	345.188	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Support in part	Considers the policy should not start from a point of enabling because this policy will be considered when consenting the listed activities where they are no longer permitted: the matters of discretion for ECO R1.4, 1.5, 2.2, 3.2 refer to this policy. Considers it is not clear whether all or some of these references are in error, because of the deletion of some policies just prior to notification. Considers it is not appropriate to provide for new roads etc through SNAs as of right, this should be limited to maintenance of existing roads and tracks. It is not clear why conservation activities are referred to in this policy. The rules provide for restoration activities, not conservation activities. If 'conservation activities' is to be retained, see submission point on its definition. Considers the list should be exhaustive, so that it only provides for the intended activities.	Amend ECO-P2 (Appropriate vegetation removal in significant natural areas): Consider enabling Enable vegetation removal within significant natural areas identified within SCHED8 where it is of a scale and nature that maintains the biodiversity values, including to provide for: 1. Maintenance around existing buildings; or 2. Safe operation of existing roads, tracks and access ways; or 3. Restoration and conservation activities including plant and animal pest control activities; or 4. Natural hazard management activities; or 5. Reduction of wildfire risk through the removal of highly flammable vegetation near existing residential units on rural property; or 6. Opportunities to enable tangata whenua to exercise customary harvesting practices (excluding commercial use).	Accept in part	No
Fire and Emergency New Zealand	FS14.4	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Oppose	Fire and Emergency consider that amending the wording of ECO-P2, as sought by the RFBPS, to 'consider enabling' the removal of highly flammable vegetation could be problematic for reducing the risk of wildfire and would be inconsistent with the provisions of the Fire and Emergency New Zealand Act 2017.	Disallow / Retain ECO-P2 as notified.	Reject	No
Meridian Energy Limited	FS101.134	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Oppose	Considers that the policy is deliberately enabling: it provides the policy 'hook' for the rules and standards managing vegetation clearance. Inserting the words 'consider enabling' is at odds with the policy's function. The policy should address the areas identified in the Schedule. Meridian's own submission point 228.75 supports inclusion of the word 'including'. Meridian agrees the policy should be addressing roads.	Allow / Seeks that part of the submission be allowed to include the insertion of roads, and otherwise and, otherwise, disallow the requested amendments.	Accept in part	No
Paul M Blaschke	435.9	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Support	ECO-P2 is particularly supported.	Retain ECO-P2 (Appropriate vegetation removal in significant natural areas) as notified.	Accept in part	No
Te Rūnanga o Toa Rangatira	488.52	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P2	Amend	[No specific reason given beyond decision requested - refer to original submission].	Amend policy ECO-P2 (Appropriate vegetation removal in significant natural areas) to: Enable vegetation removal within significant natural areas identified within SCHED8 where it is of a scale and nature that maintains the biodiversity values, including to provide for: 1. Maintenance around existing buildings; or 2. Safe operation of roads, tracks and access ways; or 3. Restoration and conservation activities including plant and animal pest control activities; or 4. Natural hazard management activities; or 5. Reduction of wildfire risk through the removal of highly flammable vegetation near existing residential units on rural property; or 6. Opportunities to enable Provide for tangata whenua to exercise customary harvesting practices (excluding commercial use).	Accept in part	Yes

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Tyers Stream Group	221.38	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P3 (Subdivision, use and development in significant natural areas) as notified.	Reject	No
Meridian Energy Limited	228.76	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Support	Considers Policy ECO-P3 (Subdivision, use and development in significant natural areas) gives effect to the objectives.	Retain Policy ECO-P3 (Subdivision, use and development in significant natural areas) as notified.	Reject	No
Horokiwi Quarries Ltd	271.23	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Support	Supports policy ECO-P3 (Subdivision, use and development in significant natural areas) as it provides a clear framework in which to address the effects of activities within an SNA.	Retain ECO-P3 (Subdivision, use and development in significant natural areas) as notified.	Reject	No
Royal Forest and Bird Protection Society	345.189	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Support in part	Considers the policy should not start from a presumption of allowing activities. It should also include SNAs in SCHED8, 9 and areas that meet Policy 23 criteria that have not yet been defined, as per the relief sought for the SNA definition. We seek the following change to the pōtai: We note that this policy applies to subdivision. Please see our submission points on the Subdivision chapter. Paragraph 1 should refer to ECO-P1. Paragraph 1 is supported, as long as ECO-P1 is amended in the way sought above, including with reference to the policy giving effect to NZCPS policy 11, ECO P5. Paragraph 2 suggests the activity will be demonstrated to be appropriate solely by considering an ecologist's report. A report is not the only consideration in determining appropriateness. Paragraph 3 needs amendment as it could be taken to suggest that no net loss via offsetting is the end goal, whereas there needs to be some effects built into the effects management hierarchy that must be avoided (in line with submission points above). Paragraph 4 is strongly supported. However, it would make more sense to include in ECO-P1. The concepts contained in paragraph 4 are what we have sought for inclusion in ECO-P1, albeit expressed as adverse effects that must be avoided.	Amend ECO-P3 (Subdivision, use and development in significant natural areas): <u>Only allow</u> for subdivision, use and development in significant natural areas listed in SCHED8 where it: 1. Applies the effects management hierarchy approach in ECO-P21; and 2. Demonstrates that it is appropriate, <u>including</u> by taking into account the findings of an ecological assessment for the activity in accordance with APP15; and 3. Ensures the activities effects on biodiversity values are appropriately managed in accordance with the effects management hierarchy, <u>and where residual effects remain after avoiding, remedying or mitigating</u> , to achieve no net loss of biodiversity values of the <u>identified</u> significant natural area; and 4. Ensures that the ecological processes, functions and integrity of the significant natural area are maintained.	Reject	No
Meridian Energy Limited	FS101.135	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Oppose	Considers that the policy should apply to areas identified in the Schedule. The proposed amendments unnecessarily replicate elements of the APP2 and APP3 management hierarchies (which apply anyway and do not require the embellishment proposed in Policy ECO-P3).	Allow / Seeks that part of the submission be allowed to include correction of the ECO-P1 policy reference and, otherwise, disallow the requested amendments.	Reject	Yes
WCC Environmental Reference Group	377.122	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Support	SNAs must be protected usually, however, this policy strikes a fair balance between interests in use and interests in protection. It is important that the effects management hierarchy is applied.	Retain ECO-P3 (Subdivision, use and development in significant natural areas) as notified.	Reject	No
Director-General of Conservation	385.42	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Amend	Policy ECO-P3 references the effects management hierarchy approach in ECO-P2, however the effects management approach is referenced ECO-P1.	Amend Policy ECO-P3 as follows: "Applies the effects management hierarchy approach in ECO-P21; and"	Accept in part	Yes
Paul M Blaschke	435.10	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P3	Support	ECO-P3 is particularly supported.	Retain ECO-P3 (Subdivision, use and development in significant natural areas) as notified.	Reject	No
Paul Van Houtte	92.1	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Amend	Considers that free roaming of cats should be restricted in ECO-P4 due to their killing of native birds and lizards when roaming, and for their spread of the toxoplasmosis disease.	Seeks that ECO-P4 (Protection and restoration initiatives) be amended to restrict free roaming of cats.	Reject	No
Victoria University of Wellington Students' Association	123.41	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Amend	Considers that ECO-P4 should be amended to allow for the practice of rāhui to be implemented when there is a threat to biodiversity from human activity. This is an important addition as rāhui is an important part of Māori conservation practice. This will allow certain protected species to thrive and be free from human interference for brief periods when there may be a threat of particular vulnerability.	Amend ECO-P4 (Protection and restoration initiatives) to include a provision that allows for the practice of rāhui to be implemented when there is a threat to biodiversity from human activity.	Reject	No
Tyers Stream Group	221.39	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P4 (Protection and restoration initiatives) as notified.	Accept in part	No
Meridian Energy Limited	228.77	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Support in part	Supports Policy ECO-P4 (Protection and restoration initiatives), provided the amendments requested to the mitigation hierarchy in Policy ECO-P1 (Protection of significant natural areas) are adopted.	Retain Policy ECO-P4 (Protection and restoration initiatives), provided the amendments requested to Policy ECO-P1 (Protection of significant natural areas) are adopted.	Accept in part	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Royal Forest and Bird Protection Society	345.190	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Support	Supports that this policy is not limited to restoration in SNAs.	Retain ECO-P4 (Protection and restoration initiatives) as notified.	Accept in part	No
WCC Environmental Reference Group	377.123	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Amend	Generally supportive and particularly supportive of the recognition of mana whenua and land owners as key players in the wording. However, the submitter considers it vital that SNAs are not only protected but also restored.	Amend ECO-P4 (Protection and restoration initiatives) to add a fourth point as follows: <u>4. Where possible, recognise and assist with the financial costs associated with protection and restoration initiatives incurred by mana whenua, landowners and community groups.</u>	Reject	No
Steve West	FS110.20	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Support	The original submitter seeks that where possible WCC recognises and assists with the financial costs associated with protection and restoration initiatives incurred by landowners. Steve West does not support the creation of SNAs on private urban land, if these are included, Steve West support the requirement for WCC to provide compensation, including for: - Substantial annual rates relief to fully compensate the landowner for costs incurred with protecting the SNA area. - Fully covering resource consent and ecologist reports, where required to support ongoing maintenance of the SNA. - Full compensation to the landowner at time of sale for the loss of land value (for the first sale of the private urban SNA). Noting that Darroch has assessed these losses could be up to 30%	Allow / Seeks that if SNAs are implemented on private urban land that WCC establish a full compensation scheme to offset the losses that impacted landowners will face because of SNAs being created.	Reject	No
Te Rūnanga o Toa Rangatira	FS138.27	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P4	Support	The submitter seeks for ECO-P4 (protection and restoration initiatives) to be amended with the addition of a fourth point as follows: where possible, recognise and assist with the financial costs associated with protection and restoration initiatives incurred by mana whenua, landowners and community groups. Te Rūnanga o Toa Rangatira support this submission because supporting these initiative would support protection and restoration which aligns with tikanga Māori. This would also support tino rangatiratanga and the ability for mana whenua to achieve their aspirations in relation to protecting and restoring te taiao.	Allow	Reject	No
Tyers Stream Group	221.40	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P5 (Significant natural areas within the coastal environment) as notified.	Accept in part	No
Meridian Energy Limited	228.78	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Support in part	Considers that policy ECO-P5 (Significant natural areas within the coastal environment) gives effect to the NZCPS. Considers that there is a minor editorial amendment required in clause 3 and there appears to be an error in the reference to Policy ECO-P2 (Appropriate vegetation removal in significant natural areas). It may be that this should be 'ECO-P1' (Protection of significant natural areas) (i.e. the mitigation hierarchy).	Retain Policy ECO-P5 (Significant natural areas within the coastal environment) with amendment.	Accept in part	No
Meridian Energy Limited	228.79	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Amend	Considers that policy ECO-P5 (Significant natural areas within the coastal environment) gives effect to the NZCPS. Considers that there is a minor editorial amendment required in clause 3 and there appears to be an error in the reference to Policy ECO-P2 (Appropriate vegetation removal in significant natural areas). It may be that this should be 'ECO-P1' (Protection of significant natural areas) (i.e. the mitigation hierarchy).	Amend Policy ECO-P5 (Significant natural areas within the coastal environment) as follows (or similar): Only allow activities within an identified significant natural area within SCHED8 in the coastal environment where it can be demonstrated that they; 1. Avoid adverse effects on the matters in Policy 11(a) of the New Zealand Coastal Policy Statement 2010; 2. Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on the matters in Policy 11(b) of the New Zealand Coastal Policy Statement 2010; and 3. Protects the other indigenous biodiversity values in accordance with <u>ECO-P1</u> ECO-P2 .	Accept in part	Yes
Horokiwi Quarries Ltd	271.24	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Oppose	Considers that given the nature of the existing quarrying activities undertaken and modified nature of the environment, parts of the Coastal Overlay as it relates to part of the exiting quarry site is opposed.	Seeks that the Significant Natural Area overlay and Coastal Environment overlay be amended as they relate to the Horokiwi quarry site. [Refer to original submission, including figure and attachments]	Reject	No
Director-General of Conservation	FS106.13	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Oppose	The methodology used to determine the extent of the Coastal Environment for the PDP should align with the criteria under Policy 1 of the New Zealand Coastal Policy Statement (NZCPS). Removal or amendments to the extent of any Coastal Environment area is not supported without the site being ground-truthed by a suitably qualified ecologist to confirm the accuracy of the current Coastal Environment mapping. The Coastal Environment area opposed by Horokiwi Quarries Ltd should be ground-truthed and assessed by WCC before a determination is made to retain, amend, or remove the Coastal Environment area. If the site does not meet the Coastal Environment criteria under Policy 1 of the NZCPS, only then should it be removed.	Disallow / Seeks that the submission is disallowed, unless it can be confirmed that the site does not meet the Coastal Environment criteria under Policy 1 of the NZCPS	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Royal Forest and Bird Protection Society	345.191	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Support in part	Considers the policy should refer to ECO-P1. In order to give effect to the NZCPS, this policy needs to apply in all zones, including residential. As noted above, this can be achieved by amending the definition of SNA to include SCHED8 and 9, and to any other area that meets Policy 23 RPS. The relationship between this policy and the general effects management hierarchy needs to be more clear. Currently the policies could allow for an argument that policy 11 NZCPS values could be managed in accordance with the general effects management hierarchy, which is incorrect. Amendments are sought to this policy and to ECO P1 above to achieve this.	Amend ECO-P5 (Significant natural areas within the coastal environment): Only allow activities within an identified significant natural area within SCHED8 in the coastal environment where it can be demonstrated that they; 1. Avoid adverse effects on the matters in Policy 11(a) of the New Zealand Coastal Policy Statement 2010; 2. Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on the matters in Policy 11(b) of the New Zealand Coastal Policy Statement 2010; and 3. Protects other the indigenous biodiversity values in accordance with ECO-P21	Accept in part	Yes
Meridian Energy Limited	FS101.136	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Oppose	Considers that the policy should apply to areas identified in the Schedule. The proposed amendments unnecessarily replicate elements of the APP2 and APP3 management hierarchies (which apply anyway and do not require the embellishment proposed in Policy ECO-P3).	Allow / Seeks that part of the submission be allowed to include correction of the ECO-P1 policy reference and, otherwise, disallow the requested amendments.	Accept	Yes
WCC Environmental Reference Group	377.124	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Support	Supportive as the Policy is consistent with national direction and it ensures the protection of coastal SNAs in accordance with the NZCPS.	Retain ECO-P5 (Significant natural areas within the coastal environment) as notified.	Accept in part	No
Director-General of Conservation	385.43	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P5	Support	Supports proposed Policy ECO-P5 (Significant natural areas within the coastal environment).	Retain policy ECO-P5 (Significant natural areas within the coastal environment) as notified.	Accept in part	No
Tyers Stream Group	221.41	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P6	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P6 (New plantation forestry) as notified.	Accept	No
Royal Forest and Bird Protection Society	345.192	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P6	Support	Supports the policy.	Retain ECO-P6 (New plantation forestry) as notified.	Accept	No
WCC Environmental Reference Group	377.125	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P6	Support	The submitter supports the intention that SNAs must be protected from new plantation forestry.	Retain ECO-P6 (new plantation forestry) as notified.	Accept	No
Tyers Stream Group	221.42	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P7	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-P7 (Existing plantation forestry) as notified.	Accept	No
Royal Forest and Bird Protection Society	345.193	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P7	Oppose	Considers it is not clear what activities this provision is intended to provide a policy basis for. While Forest & Bird may be able to support a policy such as this one, without the context of what rules/activities the policy provides for, the policy is opposed.	Delete ECO-P7 (Existing plantation forestry).	Reject	No
Royal Forest and Bird Protection Society	345.194	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-P7	Amend	If the relief sought above to delete ECO-P7 is not accepted, seeks deletion of the word "identified" in the policy.	Amend ECO-P7 (Existing plantation forestry): Provide for existing plantation forestry and associated activities where these maintain or restore the identified biodiversity values of significant natural areas.	Accept	Yes
Steve West	2.9	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Not specified	Considers that ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) is too restrictive. Native trees can grow over 15m tall and are not suited to small plots of urban land. The rules do not account for regular trimming which is important for maintaining bush in an urban environment.	Not specified.	Accept in part	yes

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Peter Kelly	16.3	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / General ECO	Amend	Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residentially zoned land. Requests that if SNAs are returned to residentially zoned land, the provisions in the draft District Plan are reinstated and fine-tuned.	If the Proposed District Plan is amended to allow Significant Natural Areas on residentially zoned land: Seeks that changes are made to ECO (Ecosystems and Indigenous Biodiversity) to give effect to the following provision: Add an amended Draft District Plan ECO-R4: i. Be held in a freehold title that existed at 18 July 2022 <u>1 July 2027</u>	Reject - relates to ECO-R1	No
Peter Kelly	16.4	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Amend	Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residentially zoned land. Requests that if SNAs are returned to residentially zoned land, the provisions in the draft District Plan are reinstated and fine-tuned.	If the Proposed District Plan is amended to allow Significant Natural Areas on residentially zoned land: Seeks that changes are made to ECO (Ecosystems and Indigenous Biodiversity) to give effect to the following provision: Add Draft District Plan ECO-R1: <u>c) where trimming or removal of vegetation is required to allow subdivision approved under SUB R-1 within an Significant Natural Area that minimises vegetation loss.</u>	Reject	No
Oliver Sangster	112.11	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Amend	Considers that it is important to strike a balance to ensure people can tend to growing bush in close proximity to existing buildings (e.g. houses) and structures (including underground pipes) to prevent damage due to tree roots growing around pipes and foundations, dead branches falling on roofs etc. Accordingly, the PDP should include provisions that this kind of maintenance be permitted to a reasonable level.	Seeks that ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) be expanded to account for damage to underground property (e.g. pipes/foundations/driveways) from growing tree roots (whether "imminent" or otherwise).	Accept in part	No
Tyers Stream Group	221.43	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) as notified.	Accept in part	No
Horokiwi Quarries Ltd	271.25	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Amend	Considers that in its current drafting, the activity status for works within a SNA outside the CE, that are not provided for within R1.1 or R1.2, is not clear as rules R1.4, R1.5 and R1.6 all apply to vegetation within the CE. R1.3 only applies to certain activities. Horokiwi understands the intent of the rule ECO-R1.4 and 1.5 may be that if you do not meet R1.1 or R1.2 and you are not affecting any NZCPS policy 11(a) matters, you are permitted regardless of whether you are within or outside the CE. However, this is not clear and open to interpretation. As proposed, the cascade rule approach does not work for vegetation work outside the CE in that there is no clear activity status and ECO-R1 is open to interpretation issues.	Seeks amendment to the activity status within ECO-R1 from non-complying under clause 6. to discretionary if amendments sought to the areas identified as SNAs (as outlined in Appendix C of the submission) and amendment to the Coastal Environment Boundary (as identified in Appendix D of the submission) are not accepted.	Accept in part	No
Horokiwi Quarries Ltd	271.26	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Amend	Considers that in its current drafting, the activity status for works within a SNA outside the CE, that are not provided for within R1.1 or R1.2, is not clear as rules R1.4, R1.5 and R1.6 all apply to vegetation within the CE. R1.3 only applies to certain activities. Horokiwi understands the intent of the rule ECO-R1.4 and 1.5 may be that if you do not meet R1.1 or R1.2 and you are not affecting any NZCPS policy 11(a) matters, you are permitted regardless of whether you are within or outside the CE. However, this is not clear and open to interpretation. As proposed, the cascade rule approach does not work for vegetation work outside the CE in that there is no clear activity status and ECO-R1 is open to interpretation issues.	Seeks an amendment to ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) to clarify the activity status for trimming, pruning or removal of vegetation within a significant natural area that is not within the Coastal Environment and does not comply with ECO-R1.1 or ECO-R1.2.	Accept in part	No
Fire and Emergency New Zealand	273.103	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Support in part	Supports the preventative mitigation of fire risk to property and life through providing for the clearance of vegetation as a permitted activity (all zones) in circumstances where FENZ is required to remove vegetation for the purposes of extinguishing or preventing the spread of fire or, where a notice has been served on a landholder to clear vegetation from a firebreak, in accordance with relevant sections of the FENZ Act.	Supports ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) with amendment.	Accept in part	No
Fire and Emergency New Zealand	273.104	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Amend	Supports the preventative mitigation of fire risk to property and life through providing for the clearance of vegetation as a permitted activity (all zones) in circumstances where FENZ is required to remove vegetation for the purposes of extinguishing or preventing the spread of fire or, where a notice has been served on a landholder to clear vegetation from a firebreak, in accordance with relevant sections of the FENZ Act.	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area) as follows: 1. Activity status: Permitted Where: ... vi. Enable the ongoing restoration work within the Zealandia sanctuary where undertaken by the Karori Sanctuary Trust; or vii. To enable the maintenance of public walking or cycling tracks and parks maintenance and repair undertaken by the Department of Conservation, a Regional or Territorial Authority, or their approved contractor, and in accordance with ECO-S2; or <u>vii. It is necessary to avoid loss of life, injury or serious damage to property, including from the risk of fire.</u>	Accept in part	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Royal Forest and Bird Protection Society	345.195	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Support in part	Supports that the rules under ECO-R1 apply to 'vegetation' within SNAs, not only indigenous vegetation. That is appropriate because exotic vegetation can provide significant habitat, and also can contribute to the ecosystem functioning of the SNA. Comment on each section of the rule are set out in the following submission points.	Not specified.	Accept	Yes
Meridian Energy Limited	FS101.137	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Not specified	Considers that the original submission does not specify the relief requested. Any amendments need to give effect to the NPS-Indigenous Biodiversity.	Allow / Seeks that the submission point be allowed to the extent that the amendments are necessary to give effect to the NPS-Indigenous Biodiversity.	Accept	No
Steve West	FS110.8	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Oppose	The original submitter seeks to include non-indigenous vegetation (other than pest plants) into the proposed trimming standards for SNAs and where an arborist is required this be a Technician Arborist, rather than a Works Arborist or a suitably qualified arborist as defined currently. Steve West does not support these proposals for the following reasons: - The trimming standards for native trees in the SNA, already places a very heavy burden on landowners through the requirements for a resource consent and ecologist's report. Adding exotic vegetation and even more stringent requirements for the type of arborist used to those requirements will further magnify this burden. - New Zealand native trees are large (many grow over 15m tall) and are not well suited to private urban land, if left unchecked. The reality is that trimming of both native and exotic trees is an important part of maintaining bush in the urban environment. - Planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNA areas and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules.	Disallow	Reject	No
Royal Forest and Bird Protection Society	345.196	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Support in part	Seeks that Council consider whether any activities should be permitted in residential areas, given our submission that residential SNAs must be reinserted. The April 2022 version of the plan (attached) included PAs for trimming or clearance for maintenance of buildings, within 5m of the building; and trimming or pruning only to maintain sunlight where a standard was complied with (then called ECO-S4, which regulated how trimming was to occur, and no branches less than 50mm wide, and over 50mm wide needs to be done by a works arborist and WCC notified prior). In residential areas, we would accept a PA for maintenance or repair of services (telecoms, wastewater etc), however for installation we submit this is better as a controlled activity, and for existing residential units only. This allows the Council more control over where and how the services are installed, so that the vegetation clearance can be kept to the absolute minimum. Providing for it as a PA does not encourage this. For services to residential units that are not existing at the time of plan notification, a higher consenting standard should apply, at least RDA. There was also a PA for a private access track, provided it complied with a standard (no wider than 1m, no trees removed where they have a trunk diameter exceeding that in Schedule 10 at 1.4m above ground). We submit this would be better as a controlled activity, to give the Council greater opportunity to ensure that any higher value parts of the SNA are avoided.	Reinstate the Draft Plan's provisions for trimming, pruning, clearance, and maintenance of buildings in Residential Areas, given the submitter is seeking to reinstate residential Significant Natural Areas.	Reject	No
Steve West	FS110.11	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Oppose	The original submitter also seeks to amend the rules that were provided for allowing landowners to create some access tracks on private urban SNA land, to make these a controlled activity. Steve West does not support this, and considers that it is unreasonable to expect private landowners to obtain a resource consent (presumably with an ecologist's report) to create a track on their land. Considers that the tracks created have allowed for placement of predator traps and weed eradication, but without these tracks, neither would have occurred due to the difficult site access.	Disallow	Accept	No
Royal Forest and Bird Protection Society	345.197	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Support in part	Considers the rule should refer to "lawfully established" public roads.	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area): 1. Activity Status: Permitted Where: a. The trimming, pruning or removal of vegetation is to: i. Ensure the operation of any <u>lawfully established</u> formed public road or rail corridor, private access leg, driveway or right of way where removal of vegetation is limited to within the formed width of the road, rail corridor or access; or...	Accept	Yes

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Royal Forest and Bird Protection Society	345.198	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Oppose in part	Considers that new fences can involve the clearing of very large amounts of significant vegetation, and without some kind of limit, this activity is not appropriate as a PA. It should become a discretionary activity. The amount of allowed trimming/removal for maintenance should also be limited to what is strictly necessary, given that it could cover a very large area. We seek that the rule is clarified to ensure that the 2m limit is the total allowed, rather than 2m on either side of the fence. Paragraph (ii) should also include a limit, that the removal/trimming is only what is strictly necessary. Opposes the PA in (iv) applying to new access tracks; this activity should be discretionary. Queries whether this provision was intended to use the defined term 'access strip'?	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area): 2. Activity Status: Permitted Where: a. The trimming or removal of vegetation is to: i. Construct new perimeter fences for stock or pest animal exclusion from areas or maintenance of existing fences for stock or pest animal exclusion provided the trimming or removal of any vegetation does not exceed 2m in width (1m maximum on either side of the fence); or ii. Maintain an existing farm drain, septic tank disposal field, or constructed stormwater management or treatment device, provided that the removal or trimming is limited to that which is necessary for the maintenance; or iii. To create a firebreak within 10m of an external wall or roof of a residential unit that existed at 18 July 2022; or iv. Maintain, upgrade or create a new an access track for agricultural, pastoral or horticultural activities in accordance with ECO-S3.	Accept in part	Yes
Royal Forest and Bird Protection Society	345.199	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Oppose	Considers the activity has the potential to remove large amounts of significant vegetation or habitat, even where the ECO S4 is applied. It is not appropriate to be a controlled activity, as the Council will not be able to refuse consent, regardless of the effects. In the coastal environment, providing for this activity as a controlled activity fails to give effect to policy 11 NZCPS.	Amend ECO-R1.3 (Trimming, pruning or removal of vegetation within a significant natural area) to a higher activity status to align with policy 11 of NZ Coastal Policy Statement.	Accept in part	Yes
Royal Forest and Bird Protection Society	345.200	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Support in part	Notes the rule appears to refer to ECO-P2 in error. Considers this rule should not be limited to excluding situations where policy 11(a) NZCPS is engaged because both paragraphs (a) and (b) of policy 11 require a different management approach than is set out in the effects management hierarchy of ECO-P1. Under ECO-P1, adverse effects only need to be avoided where practicable. That is contrary to the policy 11(a) requirement to avoid certain effects, and also to the policy 11(b) requirement to avoid significant adverse effects. Support matter of discretion reference to ECO-P1 (assuming that was intended)	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area): 5. Activity status: Restricted discretionary Where: a. Compliance with any of the requirements of ECO-R1.1 cannot be achieved; and b. The significant natural area does not contain any matters identified in Policy 11(a) of the New Zealand Coastal Policy Statement 2010 where located within the coastal environment. Matters of discretion are: The matters in ECO-P2, ECO-P3 and ECO-P4; and The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard.	Reject	No
Royal Forest and Bird Protection Society	345.201	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Support in part	Notes the rule appears to refer to ECO-P2 in error. Considers this rule should not be limited to excluding situations where policy 11(a) NZCPS is engaged because both paragraphs (a) and (b) of policy 11 require a different management approach than is set out in the effects management hierarchy of ECO-P1. Under ECO-P1, adverse effects only need to be avoided where practicable. That is contrary to the policy 11(a) requirement to avoid certain effects, and also to the policy 11(b) requirement to avoid significant adverse effects. Support matter of discretion reference to ECO-P1 (assuming that was intended)	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area): 5. Activity status: Restricted discretionary Where: a. Compliance with any of the requirements of ECO-R1.1 cannot be achieved; and b. The significant natural area does not contain any matters identified in Policy 11(a) of the New Zealand Coastal Policy Statement 2010 where located within the coastal environment. Matters of discretion are: The matters in ECO-P2, ECO-P3 and ECO-P4; and The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard.	Accept in part	Yes
Royal Forest and Bird Protection Society	345.202	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Amend	Supports non-complying status attaching to this activity. Opposes the application of this rule being limited to policy 11(a) NZCPS situations. Considers non-complying status should also apply where policy 11(b) is engaged. Also opposes the application of the effects management hierarchy in ECO-P1 applying to biodiversity that is required to be protected in accordance with policy 11(a) or (b) NZCPS as the policy requires that adverse effects (a)/significant adverse effects (b) are avoided, whereas ECO-P1 only requires avoidance of adverse effects where practicable. Considers the provisions need to be clear that the policy applying to the coastal environment (currently ECO P5) applies as a first step for these activities.	Amend ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area): 6. Activity status: Non Complying Where: a. Compliance with the requirements of ECO-R1.1 or ECO-R1.2 or ECO-R1.4 cannot be achieved; and b. The significant natural area includes matters identified in Policy 11(a) of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment. Section 88 information requirements for applications: Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15: 1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and 2. Demonstrating that <u>ECOPS has first been met</u> , and the effects management hierarchy at ECO-P2 has been applied to <u>other adverse effects</u> .	Reject	No
WCC Environmental Reference Group	377.126	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Amend	The submitter considers these rules largely strike a good balance between protection and use, however, in the interests of the primacy of indigenous biodiversity, we propose changing the activity status of R1.4 and R1.5.	Amend ECO-R1.4. (Trimming, pruning or removal of vegetation within a significant natural area) from Restricted Discretionary to Non-Complying.	Accept in part	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
The Retirement Villages Association of New Zealand Incorporated	FS126.218	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Oppose	The RVA opposes this submission point on the basis that it has the potential to affect the consenting of retirement villages and is too stringent a control.	Disallow	Reject	No
Ryman Healthcare Limited	FS128.218	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Oppose	Ryman opposes this submission point on the basis that it has the potential to affect the consenting of retirement villages and is too stringent a control.	Disallow	Reject	No
WCC Environmental Reference Group	377.127	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Amend	The submitter considers these rules largely strike a good balance between protection and use, however, in the interests of the primacy of indigenous biodiversity, we propose changing the activity status of R1.4 and R1.5.	Amend ECO-R1.5. (Trimming, pruning or removal of vegetation within a significant natural area) from Restricted Discretionary to Non-Complying.	Accept in part	No
The Retirement Villages Association of New Zealand Incorporated	FS126.219	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Oppose	The RVA opposes this submission point on the basis that it has the potential to affect the consenting of retirement villages and is too stringent a control.	Disallow	Reject	No
Ryman Healthcare Limited	FS128.219	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Oppose	Ryman opposes this submission point on the basis that it has the potential to affect the consenting of retirement villages and is too stringent a control.	Disallow	Reject	No
Zealandia Te Māra a Tāne	486.1	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R1	Support	Supports ECO-R1.a.vi. as notified. Considers that this allows for adequate biosecurity and proactive work to protect the integrity of the predator-proof fence and to mitigate the biosecurity risk. It also enables occasional trimming specific areas to allow interpretation, enable viewsheds, or to maintain wetland areas.	Retain ECO-R1.a.vi. (Trimming or Removal of Indigenous Vegetation within a Significant Natural Area) as notified.	Accept in part	No
Tyers Stream Group	221.44	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-R2 (Removal of non-indigenous vegetation within a significant natural area) as notified.	Reject	No
Royal Forest and Bird Protection Society	345.203	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Support in part	Supports this Permitted activity being limited to pest plants. Non-indigenous vegetation can provide habitat for indigenous fauna, and can otherwise form part of the ecosystem making up the SNA, and should not be able to be removed as of right. Considers this PA would be better incorporated into ECO-R1.1, given the issue below. Vegetation removal that did not comply with it would then become RDA (under ECO R1.4), or non-complying (under ECO R1.6).	Amend ECO-R2.1 (Removal of non-indigenous vegetation within a significant natural area) to be incorporated within ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area).	Accept	Yes
Steve West	FS110.9	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Oppose	The original submitter seeks to include non-indigenous vegetation (other than pest plants) into the proposed trimming standards for SNAs and where an arborist is required this be a Technician Arborist, rather than a Works Arborist or a suitably qualified arborist as defined currently. Steve West does not support these proposals for the following reasons: - The trimming standards for native trees in the SNA, already places a very heavy burden on landowners through the requirements for a resource consent and ecologist's report. Adding exotic vegetation and even more stringent requirements for the type of arborist used to those requirements will further magnify this burden. - New Zealand native trees are large (many grow over 15m tall) and are not well suited to private urban land, if left unchecked. The reality is that trimming of both native and exotic trees is an important part of maintaining bush in the urban environment. - Planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNA areas and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules.	Disallow	Reject	No
Royal Forest and Bird Protection Society	345.204	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Support in part	Notes the rule appears to refer to ECO-P2 in error. Considers it is also not clear whether the reference to ECO-P4 is therefore also in error – it appears that the appropriate references in the matters of discretion should be ECO-P1 and ECO-P3. If that is the case, we support those references.	Amend ECO-R2.2 (Removal of non-indigenous vegetation within a significant natural area): 2. Activity Status: Restricted Discretionary Where: a. Compliance is not achieved with ECO-R2.1 Matters of discretion are: The matters in ECO-P2 1 and ECO-P4 3 . Section 88 information requirements for applications: Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15 1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and 2. Demonstrating that effects management hierarchy at ECO-P2 has been applied.	Reject on the basis the rule is deleted	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Royal Forest and Bird Protection Society	345.205	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Support in part	Considers is not clear when this rule would apply. The rules in ECO-R1 already appropriately apply to the removal of all vegetation, including exotic vegetation. This rule states that it applies when compliance with ECO-R2.1 is not achieved. That suggests that the exotic vegetation at issue is not a pest plant. But if that is the case, it is already regulated by ECO R1. As noted above, we suggest that the PA ECO R2.1 is incorporated into ECO R1.1. it would then default to RDA under ECO R1.4 where the vegetation was not a pest plant. This would have he added benefit of engaging the required protections for the coastal environment, which are absent from this rule. ECO R2.2 could then be deleted. If this rule is retained, we seek that it replicates the approach of ECO R1.4, in that it does not apply where policy 11 NZCPS is relevant. We also seek an accompanying non-complying rule, to replicate ECO R1.6. That rule should refer to the coastal environment policy, ECO-P5, in the information requirements	Amend ECO-R2.2 (Removal of non-indigenous vegetation within a significant natural area) to be incorporated within ECO-R1 (Trimming, pruning or removal of vegetation within a significant natural area). Add new parallel non-complying rule to ECO-R1.6.	Reject on the basis the rule is deleted	No
WCC Environmental Reference Group	377.128	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R2	Amend	Considers that non-indigenous and old-growth vegetation (such as Pinus radiata) can be important habitat for indigenous species (such as Nestor meridionalis). It is important that removal of these large individuals is considered in that context.	Amend ECO-R2.2 (Removal of non-indigenous vegetation within a significant natural area) as follows: Matters of discretion are: The matters in ECO-P1, ECO-P2 and ECO-P4.	Reject on the basis the rule is deleted	No
Steve West	2.10	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Not specified	Considers that requirements such as needing "eco-sourced local indigenous" plants, will further discourage native planting.	Not specified.	Reject	No
Nga Kaimanaaki o te Waimapihi	215.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Amend	Considers that we need to preserve and restore indigenous native fauna. As well as preying on our native birds, cats also eat a large number of our native lizards and wētā (which are still in decline).	Seeks amendment to ECO-R3 (Restoration and maintenance of a significant natural area) to add provisions that restrict pets from roaming in Significant Natural Areas.	Reject	No
Tyers Stream Group	221.45	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-R3 (Restoration and maintenance of a significant natural area) as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.206	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Support in part	Notes this provision (and others) refers to 'identified values'. It is not clear what these are. The descriptions in SCHED 8 are often brief and high level. We seek that a greater level of detail for each SNA is provided in the schedules.	Clarify ECO-R3 (Restoration and maintenance of a significant natural area) to provide further detail on "identified values".	Reject	No
Royal Forest and Bird Protection Society	345.207	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Support in part	Considers the matters of discretion also need to refer to the policy giving effect to policy 11 NZCPS, currently ECO-P5.	Amend ECO-R3 (Restoration and maintenance of a significant natural area): 2. Activity status: Restricted Discretionary Where: a. Compliance with the requirements of ECO-R3.1 cannot be achieved Matters of discretion are: The matters in ECO-P2 and ECO-P4 Section 88 information requirements for applications: Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15: 1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and 2. Demonstrating that effects management hierarchy at ECO-P2 has been applied; and 3. Demonstrating the effects of the proposal give effect to ECO-P5 in relation the requirements of Policy 11 of the NZ Coastal Policy Statement.	Accept in part	Yes
WCC Environmental Reference Group	377.129	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Support	Considers it is important to allow and encourage the restoration and maintenance of SNAs, and this provides a fair rule framework to do so.	Retain ECO-R3 (Restoration and maintenance of a significant natural area) as notified.	Accept in part	No
Zealandia Te Māra a Tāne	486.2	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R3	Amend	Considers that ECO-R3 should be amended with an additional clause that enables Zealandia operations to continue, as per other areas in the plan. Considers that ECO-R3 may limit activities such as reintroductions of fauna species, and other related activities, as Zealandia Te Māra a Tāne is not subject to the Reserves Act, Conservation Act nor the Queen Elizabeth the Second National Trust Act.	Amend ECO-R3 (Restoration and Maintenance of a Significant Natural Area) by adding a clause that enables the ongoing restoration work within the Zealandia sanctuary where undertaken by the Karori Sanctuary Trust.	Accept	Yes
Tyers Stream Group	221.46	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R4	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-R4 (New plantation forestry within a significant natural area) as notified.	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Royal Forest and Bird Protection Society	345.208	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R4	Support	Supports the rule.	Retain ECO-R4 (New plantation forestry within a significant natural area) as notified.	Accept	No
WCC Environmental Reference Group	377.130	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-R4	Support	Considers that protection and restoration must come first in SNAs, but recognises there will be essential needs for the removal of vegetation. The submitter considers these standards are clear and comprehensive and strike a good balance between the two interests.	Retain ECO-R4 (New plantation forestry within a significant natural area) as notified.	Accept	No
Tyers Stream Group	221.47	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-S1 (Trimming, pruning or removal where there is the imminent threat to the safety of people or property) as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.209	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	Support in part	Supports this standard, with the following amendment - Notes that both 'Technician Arborist' and 'Works Arborist' are defined in the Interpretation section of this Plan. Paragraph 3 of this standard should use the defined term 'Technician Arborist', as the definition requires the skills appropriate for risk assessment relevant to this activity. It is also clearer to refer to a defined term	Amend ECO-S1 (Trimming, pruning or removal where there is the imminent threat to the safety of people or property): ... 3. Any removal is undertaken or supervised by a suitably qualified arboricultural expert <u>Technician Arborist</u> .	Reject	No
Steve West	FS110.10	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	Oppose	The original submitter seeks to include non-indigenous vegetation (other than pest plants) into the proposed trimming standards for SNAs and where an arborist is required this be a Technician Arborist, rather than a Works Arborist or a suitably qualified arborist as defined currently. Steve West does not support these proposals for the following reasons: - The trimming standards for native trees in the SNA, already places a very heavy burden on landowners through the requirements for a resource consent and ecologist's report. Adding exotic vegetation and even more stringent requirements for the type of arborist used to those requirements will further magnify this burden. - New Zealand native trees are large (many grow over 15m tall) and are not well suited to private urban land, if left unchecked. The reality is that trimming of both native and exotic trees is an important part of maintaining bush in the urban environment. - Planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNA areas and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules.	Disallow		No
Greater Wellington Regional Council	351.154	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	Amend	Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes. Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the "significant habitats of indigenous fauna" not the significant indigenous habitats of indigenous fauna.	Seeks to amend standard (where relevant) to change 'indigenous vegetation' to 'vegetation'.	Accept	Yes

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Steve West	FS110.14	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	Oppose	<p>The submitter seeks to include non-indigenous vegetation into the proposed trimming standards for SNAs, in addition to indigenous vegetation. The submitter has also recommended additional controls be applied in areas adjacent to SNAs, such as buffer zones and ecological corridors.</p> <p>Do not support these proposals for the following reasons:</p> <ul style="list-style-type: none"> - The trimming standards, while intended to protect native trees, places a very heavy burden on landowners through the requirements for a resource consent and ecologist's report. Adding exotic vegetation to those requirements would add to this burden. - New Zealand native trees are large (many grow over 15m tall) and are not well suited to private urban land, if left unchecked. The reality is that trimming is an important part of maintaining bush in the urban environment. - The likelihood of urban native bush being cleared by landowners prior to the district plan coming into effect will be magnified by including exotics. Whether urban bush remains or is removed will likely come down to whether the landowner loves their bush more than they hate SNAs, or if they hate SNAs more than they love their bush. - Planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNA areas and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules. - Rather than becoming a world-renowned "nature city", Wellington could well become known as "the exotic city", where indigenous biodiversity gains were squandered through implementation of the poorly developed SNA policy. <p>[Refer to further submission for full reason]</p>	Disallow	Reject	No
WCC Environmental Reference Group	377.131	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S1	Support	Considers that protection and restoration must come first in SNAs, but recognises there will be essential needs for the removal of vegetation. The submitter considers these standards are clear and comprehensive and strike a good balance between the two interests.	Retain ECO-S1 (Trimming, pruning or removal where there is the imminent threat to the safety of people or property) as notified.	Accept in part	No
Tyers Stream Group	221.48	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S2	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-S2 (Vegetation removal associated with maintenance or repair of public walking and cycling tracks including parks maintenance and repair) as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.210	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S2	Support in part	Considers the standard could be more clear as to how much clearance is allowed.	<p>Amend ECO-S2 (Vegetation removal associated with maintenance or repair of public walking and cycling tracks including parks maintenance and repair):</p> <p>Vegetation removal <u>or</u> <u>trimming</u> must:</p> <ol style="list-style-type: none"> 1. Not be greater than 2.5m in width <u>in total</u>, to accommodate the track 	Accept	Yes
Greater Wellington Regional Council	351.155	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S2	Amend	<p>Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes.</p> <p>Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the "significant habitats of indigenous fauna" not the significant indigenous habitats of indigenous fauna.</p>	Seeks to amend standard (where relevant) to change 'indigenous vegetation' to 'vegetation'.	Accept	Yes

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Steve West	FS110.15	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S2	Oppose	<p>The submitter seeks to include non-indigenous vegetation into the proposed trimming standards for SNAs, in addition to indigenous vegetation. The submitter has also recommended additional controls be applied in areas adjacent to SNAs, such as buffer zones and ecological corridors.</p> <p>Do not support these proposals for the following reasons:</p> <ul style="list-style-type: none"> - The trimming standards, while intended to protect native trees, places a very heavy burden on landowners through the requirements for a resource consent and ecologist's report. Adding exotic vegetation to those requirements would add to this burden. - New Zealand native trees are large (many grow over 15m tall) and are not well suited to private urban land, if left unchecked. The reality is that trimming is an important part of maintaining bush in the urban environment. - The likelihood of urban native bush being cleared by landowners prior to the district plan coming into effect will be magnified by including exotics. Whether urban bush remains or is removed will likely come down to whether the landowner loves their bush more than they hate SNAs, or if they hate SNAs more than they love their bush. - Planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNA areas and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules. - Rather than becoming a world-renowned "nature city", Wellington could well become known as "the exotic city", where indigenous biodiversity gains were squandered through implementation of the poorly developed SNA policy. <p>[Refer to further submission for full reason]</p>	Disallow	Reject	No
WCC Environmental Reference Group	377.132	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S2	Support	<p>Considers that protection and restoration must come first in SNAs, but recognises there will be essential needs for the removal of vegetation. The submitter considers these standards are clear and comprehensive and strike a good balance between the two interests.</p>	Retain ECO-S2 (Vegetation removal associated with maintenance or repair of public walking and cycling tracks including parks maintenance and repair) as notified.	Accept in part	No
Tyers Stream Group	221.49	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S3	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-S3 (Vegetation removal associated with farm access tracks) as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.211	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S3	Support in part	<p>Supports the standard, though notes opposition to new tracks being a Permitted activity noted in previous submission points on ECO rules.</p>	Retain ECO-S3 (Vegetation removal associated with farm access tracks) as notified.	Accept in part	No
Greater Wellington Regional Council	351.156	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S3	Amend	<p>Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes.</p> <p>Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the "significant habitats of indigenous fauna" not the significant indigenous habitats of indigenous fauna.</p>	Seeks to amend standard (where relevant) to change 'indigenous vegetation' to 'vegetation'.	Accept	Yes
Steve West	FS110.16	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S3	Oppose	<p>The submitter seeks to include non-indigenous vegetation into the proposed trimming standards for SNAs, in addition to indigenous vegetation. The submitter has also recommended additional controls be applied in areas adjacent to SNAs, such as buffer zones and ecological corridors.</p> <p>Do not support these proposals for the following reasons:</p> <ul style="list-style-type: none"> - The trimming standards, while intended to protect native trees, places a very heavy burden on landowners through the requirements for a resource consent and ecologist's report. Adding exotic vegetation to those requirements would add to this burden. - New Zealand native trees are large (many grow over 15m tall) and are not well suited to private urban land, if left unchecked. The reality is that trimming is an important part of maintaining bush in the urban environment. - The likelihood of urban native bush being cleared by landowners prior to the district plan coming into effect will be magnified by including exotics. Whether urban bush remains or is removed will likely come down to whether the landowner loves their bush more than they hate SNAs, or if they hate SNAs more than they love their bush. - Planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNA areas and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules. - Rather than becoming a world-renowned "nature city", Wellington could well become known as "the exotic city", where indigenous biodiversity gains were squandered through implementation of the poorly developed SNA policy. <p>[Refer to further submission for full reason]</p>	Disallow	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
WCC Environmental Reference Group	377.133	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S3	Support	Considers that protection and restoration must come first in SNAs, but recognises there will be essential needs for the removal of vegetation. The submitter considers these standards are clear and comprehensive and strike a good balance between the two interests.	Retain ECO-S3 (Vegetation removal associated with farm access tracks) as notified.	Accept in part	No
Tyers Stream Group	221.50	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S4	Support	[No specific reason given beyond decision requested - refer to original submission]	Retain ECO-S4 (Vegetation removal associated with upgrading of existing and creation of new public walking and cycling tracks and associated buildings and structures) as notified.	Reject as it is recommended that the standard is deleted	No
Royal Forest and Bird Protection Society	345.212	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S4	Support in part	Supports the standard with minor amendment, though notes opposition to new tracks being a Permitted activity noted in previous submission points on ECO rules.	Amend ECO-S4 (Vegetation removal associated with upgrading of existing and creation of new public walking and cycling tracks and associated buildings and structures): Vegetation removal or trimming must: 1. Not be greater than 2.5m in width in total, to accommodate the track	Reject as it is recommended that the standard is deleted	No
Greater Wellington Regional Council	351.157	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S4	Amend	Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes. Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the "significant habitats of indigenous fauna" not the significant indigenous habitats of indigenous fauna.	Seeks to amend standard (where relevant) to change 'indigenous vegetation' to 'vegetation'.	Reject as it is recommended that the standard is deleted	No
Steve West	FS110.17	Part 2 / Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S4	Oppose	The submitter seeks to include non-indigenous vegetation into the proposed trimming standards for SNAs, in addition to indigenous vegetation. The submitter has also recommended additional controls be applied in areas adjacent to SNAs, such as buffer zones and ecological corridors. Do not support these proposals for the following reasons: - The trimming standards, while intended to protect native trees, places a very heavy burden on landowners through the requirements for a resource consent and ecologist's report. Adding exotic vegetation to those requirements would add to this burden. - New Zealand native trees are large (many grow over 15m tall) and are not well suited to private urban land, if left unchecked. The reality is that trimming is an important part of maintaining bush in the urban environment. - The likelihood of urban native bush being cleared by landowners prior to the district plan coming into effect will be magnified by including exotics. Whether urban bush remains or is removed will likely come down to whether the landowner loves their bush more than they hate SNAs, or if they hate SNAs more than they love their bush. - Planting of new trees (both indigenous and exotic) in the urban environment will likely diminish over time, both within the SNA areas and elsewhere as other landowners in Wellington become aware of the extent and onerous nature of the rules. - Rather than becoming a world-renowned "nature city", Wellington could well become known as "the exotic city", where indigenous biodiversity gains were squandered through implementation of the poorly developed SNA policy. [Refer to further submission for full reason]	Disallow	Reject	No
WCC Environmental Reference Group	377.134	Natural and Environmental Values / Ecosystems and Indigenous Biodiversity / ECO-S4	Amend	Considers that it is vital that any new tracks and associated buildings and structures are well considered from an ecological perspective, to avoid high-value biodiversity being inadvertently damaged.	Amend ECO-S4 (Vegetation removal associated with upgrading of existing and creation of new public walking and cycling tracks and associated buildings and structures) as follows: Split ECO-S4 into two new standards, reading: <u>ECO-S4: vegetation removal associated with upgrading of existing public walking and cycling tracks and associated buildings and structures</u> <u>Vegetation removal must:</u> <u>1. Not be greater than 2.5m in width to accommodate the track and associated track structures; and</u> <u>2. Not be greater than 5m2 in area to accommodate any ancillary buildings or structures.</u> <u>ECO-S5: Vegetation removal must:</u> <u>1. Not be greater than 2.5m in width to accommodate the track and associated track structures;</u> <u>2. Not be greater than 5m2 in area to accommodate any ancillary buildings or structures; and</u> <u>3. Demonstrate that it is appropriate by taking into account the findings of an ecological assessment for the activity in accordance with APP15.</u>	Reject as it is recommended that the standard is deleted	No
Royal Forest and Bird Protection Society	345.3	Interpretation Subpart / Interpretation General / Interpretation General	Support in part	Generally supports these provisions as drafted, except for the definitions noted below.	Retain "Interpretation" section as notified, except for the definitions submitted on below.	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Director-General of Conservation	385.10	Interpretation Subpart / Definitions / New definition	Not specified	Considers appropriate to include an additional definition for a 'restoration or enhancement activity' in relation to the natural environment. Some of the policies and rules under this chapter refer to 'restoration', however the only definition of restoration under the Proposed District Plan relates to heritage values.	Seeks that an additional definition is include for a 'restoration or enhancement activity' in relation to the natural environment.	Accept in part	No
Greater Wellington Regional Council	FS84.14	Part 1 / Interpretation Subpart / Definitions / New definition	Support	Greater Wellington agree that the proposed definitions of 'restored' and 'restoration' do not adequately support the interpretation of the plan provisions. The terms are also not consistent with the regional plan.	Allow / Seeks definitions that are either consistent with the regional plan or a new definition for 'Restoration or Enhancement Activity'.	Accept in part	No
Transpower New Zealand Limited	315.16	Interpretation Subpart / Definitions / BIODIVERSITY COMPENSATION	Support	[no specific reason provided, see full submission]	Retain the definition of Biodiversity Compensation as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.4	Interpretation Subpart / Definitions / BIODIVERSITY COMPENSATION	Oppose in part	Considers compensation is not an appropriate management tool for significant biodiversity, particularly in the context of an effects management hierarchy that lacks any requirement to avoid particular effects and therefore seeks that this definition be deleted. Notes that if the definition does remain, seeks that it requires no net loss and preferably a net gain. This is more clear than the standard of 'disproportionately positive'.	Delete definition of "biodiversity compensation".	Reject	No
KiwiRail Holdings Limited	FS72.3	Part 1 / Introduction and General Provisions / Definitions / Biodiversity Compensation	Oppose	Rejects the deletion of the definition of 'Biodiversity compensation' as this definition assists with the interpretations and implementation of ECP-P1. Considers the relief sought should be declined because it a) will not promote the sustainable management of the natural and physical resources in Wellington City, and is therefore contrary to, or inconsistent with, Part 2 and other provisions of the RMA and the Amendment Act; (b) is inconsistent with other relevant planning documents, including the Greater Wellington Regional Policy Statement and National Policy Statement for Urban Development 2020; (c) will not meet the reasonably foreseeable needs of future generations; (d) will not avoid, remedy or mitigate actual and potential adverse effects on the environment; (e) will not enable the social, economic and cultural wellbeing of people of Wellington City; and (f) is not the most appropriate way to achieve the objectives of the Proposed Plan in terms of section 32 of the RMA.	Disallow		No
Greater Wellington Regional Council	FS84.96	Part 1 / Interpretation Subpart / Definitions / BIODIVERSITY COMPENSATION	Support	Greater Wellington support the amendment of the "Biodiversity compensation" definition to require "no net loss and preferably a net gain" for clarification and to have regard to Proposed RPS Change 1.	Allow / Seeks the definition for 'Biodiversity Compensation' be amended to ensure 'no net loss and preferably a net gain'	Accept in part	No
Meridian Energy Limited	FS101.2	Part 1 / Interpretation Subpart / Definitions / BIODIVERSITY COMPENSATION	Oppose	Considers that compensation is an appropriate management tool, including for effects on significant biodiversity, within an effects management hierarchy. Meridian considers that the definition should be retained and require no net loss and preferably a net gain.	Disallow	Accept	No
Royal Forest and Bird Protection Society	345.5	Interpretation Subpart / Definitions / BIODIVERSITY COMPENSATION	Oppose in part	Considers compensation is not an appropriate management tool for significant biodiversity, particularly in the context of an effects management hierarchy that lacks any requirement to avoid particular effects and therefore seeks that this definition be deleted. Notes that if the definition does remain, seeks that it requires no net loss and preferably a net gain. This is more clear than the standard of 'disproportionately positive'.	Amend definition of "biodiversity compensation" to require no net loss and preferably a net gain, instead of "Disproportionately positive" "... The goal of biodiversity compensation is to achieve an outcome for indigenous biodiversity values that is disproportionately positive relative to the values lost of no net loss and preferably a net gain."	Accept	Yes
Greater Wellington Regional Council	FS84.97	Part 1 / Interpretation Subpart / Definitions / BIODIVERSITY COMPENSATION	Support	Greater Wellington support the amendment of the "Biodiversity compensation" definition to require "no net loss and preferably a net gain" for clarification and to have regard to Proposed RPS Change 1.	Allow / Seeks the definition for 'Biodiversity Compensation' be amended to ensure 'no net loss and preferably a net gain'	Accept	No
Meridian Energy Limited	FS101.3	Part 1 / Interpretation Subpart / Definitions / BIODIVERSITY COMPENSATION	Oppose	Considers that compensation is an appropriate management tool, including for effects on significant biodiversity, within an effects management hierarchy. Meridian considers that the definition should be retained and require no net loss and preferably a net gain.	Disallow	Reject	No
Director-General of Conservation	385.11	Interpretation Subpart / Definitions / BIODIVERSITY COMPENSATION	Support	Supports the proposed definition of Biodiversity Compensation.	Retain the definition of 'Biodiversity Compensation' as notified.	Accept in part	No
Transpower New Zealand Limited	315.17	Interpretation Subpart / Definitions / BIODIVERSITY OFFSETTING	Support	Supports the definition in respect of the reference to achieving the goal of no net loss, as opposed to a requirement for a net gain.	Retain the definition of Biodiversity Offsetting as notified.	Accept in part	No
Royal Forest and Bird Protection Society	345.6	Interpretation Subpart / Definitions / BIODIVERSITY OFFSETTING	Support	Supports the definition.	Retain the definition of "biodiversity offsetting" as notified.	Accept in part	No
Director-General of Conservation	385.12	Interpretation Subpart / Definitions / BIODIVERSITY OFFSETTING	Support	Supports the proposed definition of Biodiversity Offsetting.	Retain the definition of 'Biodiversity Offsetting' as notified.	Accept in part	No
Greater Wellington Regional Council	351.38	Interpretation Subpart / Definitions / DRAIN	Amend	Considers it is appropriate to define a drain, particularly where it forms part of a drainage network such as that operated by Greater Wellington. It is slightly inconsistent with the regional plan definition.	Seeks to amend the Definition of 'Drain' to align with regional plan definition.	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Director-General of Conservation	385.14	Interpretation Subpart / Definitions / ECO-SOURCED LOCAL INDIGENOUS VEGETATION	Support	Supports the proposed definition of Eco-Sourced Local Indigenous Vegetation.	Retain the definition of 'Eco-Sourced Local Indigenous Vegetation' as notified.	Accept	No
Royal Forest and Bird Protection Society	345.8	Interpretation Subpart / Definitions / INDIGENOUS VEGETATION	Oppose in part	Oppose the exclusion for indigenous vegetation as defined in and regulated by the NESPF. The NESPF allows for plans to be more stringent to protect significant biodiversity and for NZCPS and that would not be possible with this definition in place. We therefore seek that the second sentence of this definition is deleted.	Amend the definition of "indigenous vegetation": Means vegetation or plant species, including trees, which are native to Wellington district. Indigenous Vegetation does not include "indigenous vegetation" as defined in and regulated by the NESPF.	Accept in part	Yes
Royal Forest and Bird Protection Society	345.9	Interpretation Subpart / Definitions / PEST	Support	Supports the definition.	Retain the definition of "pest" as notified.	Accept	No
Royal Forest and Bird Protection Society	345.11	Interpretation Subpart / Definitions / RESTORATION	Oppose in part	Considers the definition does not apply easily to ecological restoration and therefore seeks that this definition is amended	Amend definition of "restoration": Means an alteration to return a place to a known earlier form, by reassembly and reinstatement, and/or by removal of elements that detract from its heritage value, <u>or the rehabilitation of sites, habitats or ecosystems to support indigenous flora and fauna, ecosystem functions and natural processes that would naturally occur in the ecosystem and locality.</u>	Accept in part	No
Royal Forest and Bird Protection Society	345.12	Interpretation Subpart / Definitions / RESTORED	Support	Supports the definition.	Retain the definition of "restored" as notified.	Accept in part	No
Greater Wellington Regional Council	351.47	Interpretation Subpart / Definitions / RESTORED	Amend	Considers the definition aligns with regional plan definition of 'restoration' relating to natural heritage but is inconsistently named	Seeks to amend the Definition of 'Restored' to align with regional plan definition.	Reject	No
Transpower New Zealand Limited	315.35	Interpretation Subpart / Definitions / SIGNIFICANT NATURAL AREA	Support	Supports the identification of such areas on the basis it assists plan users and provides clarity on the application of the plan provisions that relate to the definition.	Retain the definition of Significant Natural Area as notified.	Accept	No
Royal Forest and Bird Protection Society	345.14	Interpretation Subpart / Definitions / SIGNIFICANT NATURAL AREA	Support in part	Considers the definition should also include areas of significant biodiversity values that meet Policy 23 RPS criteria, but that are not yet on Schedule 8, for example where they are discovered as part of a consenting process. It also needs to include reference to the deleted SCHED9 – Urban Environment Allotments. Notes that the plan refers to SNAs in varying ways in different chapters. Some chapters simply use the term 'Significant Natural Area', while others refer to SCHED 8. We seek that the defined term is used throughout the plan.	Amend definition of "significant natural area": Means an area of significant indigenous vegetation or significant habitat of indigenous fauna <u>that meets any of the criteria in Policy 23 of the Wellington Regional Policy Statement, whether identified in SCHED8 - Significant Natural Areas, SCHED9- Urban Environment Allotments, or as part of a consenting process.</u>	Reject	No
Meridian Energy Limited	FS101.11	Part 1 / Interpretation Subpart / Definitions / SIGNIFICANT NATURAL AREA	Oppose	Meridian understands the desire to ensure all 'significant natural areas' are captured but the request erodes the certainty provided by the definition. Considers that plan users and resource users need the certainty of knowing, in any given situation, what and where significant natural areas are located.	Disallow	Reject	No
Peter Kelly	16.1	Whole PDP / Whole PDP / Whole PDP	Support	Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residential zoned land. Requests that if SNAs are returned to residentially zoned land, the provisions in the draft District Plan are reinstated and fine-tuned.	If the Proposed District Plan is amended to allow Significant Natural Areas on residentially zoned land: Seeks that the proposed District Plan gives effect to paragraph 6 of the amendment in the name of Councillors Jenny Condie and Rebecca Matthews.	Reject	No
Greater Wellington Regional Council	351.14	Whole PDP / Whole PDP / Whole PDP	Amend	Considers that throughout the plan ECO-P2 is incorrectly referred to, where reference should be made instead to ECO-P1.	Seeks to amend incorrect ECO-P2 (Appropriate vegetation removal in significant natural areas) cross-references to ECO-P1 (Protection of significant natural areas).	Accept in part	Yes
Director-General of Conservation	385.1	Whole PDP / Whole PDP / Whole PDP	Oppose in part	Considers that the Proposed District Plan does not adequately give effect to the NPS-FM. For example, there is a lack of objectives, policies, and methods that protect wetlands. At feedback stage for the Draft District Plan 2021, the Greater Wellington Regional Council (GWRC) sought a new objective for wetlands to protect waterways and wetlands. The Council rejected this feedback on the basis that "wetlands jurisdiction falls within NPS-FW [NPS-FM] and Greater Wellington Regional Council jurisdiction". Guidance prepared by the Ministry for the Environment2 (MfE) specifies that "territorial authorities must include objectives, policies, and methods in their district plans to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments".	Opposes in part to the Proposed District Plan in its current form and seeks amendment.	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Director-General of Conservation	385.2	Whole PDP / Whole PDP / Whole PDP	Amend	<p>Considers that the Proposed District Plan does not adequately give effect to the NPS-FM. For example, there is a lack of objectives, policies, and methods that protect wetlands. At feedback stage for the Draft District Plan 2021, the Greater Wellington Regional Council (GWRC) sought a new objective for wetlands to protect waterways and wetlands. The Council rejected this feedback on the basis that "wetlands jurisdiction falls within NPS-FW [NPS-FM] and Greater Wellington Regional Council jurisdiction".</p> <p>Guidance prepared by the Ministry for the Environment2 (MfE) specifies that "territorial authorities must include objectives, policies, and methods in their district plans to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments".</p> <p>It is noted that MfE requires the Council to notify changes to regional policy statements, regional plans, and district plans to give effect to the new NPS-FM 2020 by 31 December 2024. To avoid an additional plan change, it would be prudent for the Council to incorporate this national direction into the Proposed District Plan.</p>	Seeks that there are additional objectives, policies, and methods to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments (including wetlands).	Reject	No
Greater Wellington Regional Council	FS84.11	General / Whole PDP / Whole PDP / Whole PD	Support	Greater Wellington strongly support requests to amend the Proposed District Plan to promote positive effects and avoid, remedy or mitigate adverse effects of urban development on freshwater and welcome working with WCC to give effect to the NPSFM.	Allow	Reject	No
Director-General of Conservation	385.4	Whole PDP / Whole PDP / Whole PDP	Amend	<p>Considers that the Proposed District Plan does not adequately give effect to the NPS-FM. For example, there is a lack of objectives, policies, and methods that protect wetlands. At feedback stage for the Draft District Plan 2021, the Greater Wellington Regional Council (GWRC) sought a new objective for wetlands to protect waterways and wetlands. The Council rejected this feedback on the basis that "wetlands jurisdiction falls within NPS-FW [NPS-FM] and Greater Wellington Regional Council jurisdiction".</p> <p>Guidance prepared by the Ministry for the Environment2 (MfE) specifies that "territorial authorities must include objectives, policies, and methods in their district plans to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments".</p> <p>It is noted that MfE requires the Council to notify changes to regional policy statements, regional plans, and district plans to give effect to the new NPS-FM 2020 by 31 December 2024. To avoid an additional plan change, it would be prudent for the Council to incorporate this national direction into the Proposed District Plan.</p>	Seeks that the Council work with GWRC to identify any additional sites/areas that should be protected under the Proposed District Plan and RPS in line with the NPS-FM.	Accept	No
Director-General of Conservation	385.5	Whole PDP / Whole PDP / Whole PDP	Amend	<p>Considers that the Proposed District Plan does not adequately give effect to the NPS-FM. For example, there is a lack of objectives, policies, and methods that protect wetlands. At feedback stage for the Draft District Plan 2021, the Greater Wellington Regional Council (GWRC) sought a new objective for wetlands to protect waterways and wetlands. The Council rejected this feedback on the basis that "wetlands jurisdiction falls within NPS-FW [NPS-FM] and Greater Wellington Regional Council jurisdiction".</p> <p>Guidance prepared by the Ministry for the Environment2 (MfE) specifies that "territorial authorities must include objectives, policies, and methods in their district plans to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments".</p> <p>It is noted that MfE requires the Council to notify changes to regional policy statements, regional plans, and district plans to give effect to the new NPS-FM 2020 by 31 December 2024. To avoid an additional plan change, it would be prudent for the Council to incorporate this national direction into the Proposed District Plan.</p>	Seeks that any policy and rules in relation to wetlands are in line with the NZCPS (New Zealand Coastal Policy Statement 2010).	Accept	No
Director-General of Conservation	385.6	Whole PDP / Whole PDP / Whole PDP	Amend	<p>Considers that it would be effective and efficient to align the review of the Proposed District Plan provisions with the policy direction and requirements anticipated under the NPS-IB, to avoid an additional plan change.</p> <p>The NPS-IB currently has no legal effect; however, it is expected to come into effect in December 2022 during the Proposed District Plan further submissions and hearing process.</p>	Seeks that the Council undertakes a review of the NPS-IB exposure draft (or the soon to be gazetted NPS-IB document) to confirm the Proposed District Plan is giving effect to this national direction.	Accept in part	No
Director-General of Conservation	385.7	Whole PDP / Whole PDP / Whole PDP	Amend	<p>Considers that it would be effective and efficient to align the review of the Proposed District Plan provisions with the policy direction and requirements anticipated under the NPS-IB, to avoid an additional plan change.</p> <p>The NPS-IB currently has no legal effect; however, it is expected to come into effect in December 2022 during the Proposed District Plan further submissions and hearing process.</p>	Seeks that the Proposed District Plan should be updated to give effect to the NPS-IB where required.	Accept	Yes
Steve West	2.1	Mapping / Mapping General / Mapping General	Amend	Mapping of SNA boundaries in Wellington run through the middle of bushy areas. The use of imprecise maps to show where the SNA boundaries are is inappropriate, these boundaries require proper markings.	Seeks that accurate cadastral markings of the Significant Natural Area boundaries are provided so all parties are clear about the boundaries and where the proposed District Plan rules will apply.	Reject	
Oliver Sangster	112.4	Mapping / Mapping General / Mapping General	Amend	Generally supports the use of SNA provisions, including on private land across contiguous vegetation areas to protect indigenous biodiversity.	Amend mapping of Significant Natural Areas to include privately owned land. [Inferred Decision Requested]	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Oliver Sangster	112.5	Mapping / Mapping General / Mapping General	Not specified	Considers that, should landowners object to specific SNA provisions on their land due to low accuracy of maps/modelling, the council adjust the SNA maps to improve their accuracy in relation to what exists "on the ground".	Seeks that the accuracy of the mapping of Significant Natural Area on private land be improved.	Reject	No
Paul Blaschke	FS129.5	General / Mapping / Mapping General / Mapping General	Support	Agrees with the general thrust of this submission point that the accuracy of the mapping of SNAs on all land (not just private land) must be high, and where there is low accuracy in relation to what exists " on the ground, then this should be rectified before the DP is finalised and becomes Operative. Assumes this ground-truthing process can occur once a specific point of low accuracy is identified - not as a blanket withdrawal of all SNAs on private land.	Allow / Seeks that the accuracy of the mapping of all SNAs is improved where a specific problem is identified.	Reject	No
Nga Kaimanaaki o te Waimapihi	215.1	Mapping / Mapping General / Mapping General	Amend	Considers that we need to preserve and restore indigenous native fauna. As well as preying on our native birds, cats also eat a large number of our native lizards and wētā (which are still in decline).	Add a buffer area around significant natural areas to support recovering populations of endangered (once locally extinct) endemic species where pets would not be allowed to roam.	Reject	No
Kāinga Ora – Homes and Communities	FS89.86	General / Mapping / Mapping General / Mapping General	Oppose	Kāinga Ora opposes this submission due to concerns about the implications for enabling housing intensification, particularly as other submitters seek that urban significant natural areas are also identified. Kāinga Ora notes that the District Plan cannot manage domestic animals.	Disallow	Accept	No
Te Marama Ltd	337.1	Mapping / Mapping General / Mapping General	Amend	Considers that Item WC054 (Makara Peak) should be removed from SCHED8 as it imposes an SNA on Te Marama property. WC054 states "Much of the site is WCC public land" and SNAs being imposed on public land is not opposed.	Remove SNA overlay at Lot 6 DP 477282 and 171 South Makara Road (Part Section 16 Makara DIST).	Reject	No
M&P Makara Family Trust	FS41.21	Mapping / Mapping General / Mapping General	Oppose	The PDP as notified allows for 10 guests per night in temporary accommodation for one residential unit, and any number greater than this is sufficiently covered by the discretionary framework. The PDP as notified retains the existing one household per allotment which is sufficient to encourage larger blocks to place that unit where it is most easily accessible or useful for their purposes. Any number greater than this is sufficiently covered by the resource consent framework. M&P Trust also submits that the intent of the subdivision provisions in the Rural Area, including their time-related requirement, is to anticipate a lower rate of residential development in than urban areas. Allowing more than one residential unit per allotment defeats the purpose of these subdivision provisions. Any number greater than this is sufficiently covered by the resource consent framework.	Disallow	Reject	No
Greater Wellington Regional Council	351.31	Mapping / Mapping General / Mapping General	Oppose	Though Greater Wellington supports WCC's identification of SNAs in line with RPS Policy 23, we oppose the omission of SNAs on private residential land from the Proposed District Plan (PDP) because: <ul style="list-style-type: none"> the removal of identified SNAs from the PDP contradictory to national direction for indigenous biodiversity protection. Section 6(c) of the RMA 1991 states that 'the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna' is a matter of national importance, and that this matter must be 'recognised and provided for' by all persons exercising functions and powers under the RMA, including local authorities under Sections 30 and 31. the removal of SNAs on private residential land from the PDP is contrary to Policy 24 of RPS. Policy 24 directs district councils to include in their district plans policies, rules and methods to protect the indigenous ecosystems and habitats identified in accordance with policy 23. Policy 24 requires district councils to protect all areas identified in accordance with policy 23 through provisions in their district plans. the removal of identified SNAs on private residential land from the PDP to be inconsistent with WCC's vision and aspirations for protecting and restoring the city's indigenous biodiversity. The Our Natural Capital: Wellington's Biodiversity Strategy and Action Plan 2015[1] states that WCC will protect biodiversity by 'focussing on the protection of priority biodiversity sites on public and private land and rare, threatened, or locally significant species', and that it will build natural capital by 'respect[ing] the importance of indigenous biodiversity to New Zealand and its intrinsic right to exist'. We do not consider the exclusion of SNA on private residential land to align with this direction. 	Seeks to apply SNAs to all zones as intended by section 6 of the RMA and Policy 24 of the RPS.	Reject	No
Wellington Civic Trust	FS83.72	General / Mapping / Mapping General / Mapping General	Support	Wellington Civic Trust supports this submission as the existence of SNAs on private land contributes considerably to the character, amenity and attractiveness of the city, as well as its ecological sustainability and climate change resilience.	Allow	Reject	No
Royal Forest and Bird Protection Society of New Zealand Inc	FS85.10	General / Whole PDP / Whole PDP / Whole PDP	Support	As per Forest & Bird's original submission, exclusion of SNAs from all zones is contrary to section 6 of the RMA and Policy 24 of the RPS.	Allow	Reject	No
Kāinga Ora – Homes and Communities	FS89.14	General / Mapping / Mapping General / Mapping General	Oppose	Kāinga Ora supports the identification and mapping of SNAs as individual overlays in the District Plan. However, Kāinga Ora does not support blanket application of SNAs on residential zones. [Inferred reference to submission 351.31]	Disallow	Accept	No
Paul Blaschke	FS129.4	General / Mapping / Mapping General / Mapping General	Support	Support all submissions requesting the reinstatement of identified and verified Significant Natural Area status on all properties whether public or private and whether residentially or rurally zoned. This is for the reasons stated in submission point 110.1 and most fully stated by submission point 351.31.	Allow / As per submission point 351.31, and "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties, and the regulatory framework in the Ecosystems and Indigenous Biodiversity section to those SNAs or SNA proportions affected." (my previous submission points 110.1 and 110.2)	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Greater Wellington Regional Council	351.32	Mapping / Mapping General / Mapping General	Amend	Considers the primary function of mapping area scale natural character ratings (low – high) in the PDP is to ensure applicants do not have to undertake this work as part of applications for resource consent, to give effect to NZCPS Policy 13(1)(b). It would not be efficient or effective to require applicants for resource consent to undertake this step as part of a consent process, especially when the work has already been commissioned by WCC, presumably to be included in the PDP. Mapping the full range of natural character areas in the PDP also provides more certainty to applicants/developers on areas that are more suitable/less suitable for development based on an improved understanding of the natural character values present.	Seeks to map natural character ratings at all levels (low, moderate, high) at the wider area scale in Schedule 12, as undertaken in the 2016 Boffa Miskell natural character assessment.	Reject	No
Greater Wellington Regional Council	351.33	Mapping / Mapping General / Mapping General	Oppose	Considers the proposed mapping approach is not appropriate to achieve CE-O1, does not fully incorporate the 2016 Boffa Miskell assessment, and will be less effective in giving effect to NZCPS 13(1)(b).	Map area scale natural character ratings (in addition to the sites of high and very high natural character already included in the proposed approach) identified in Boffa Miskell’s natural character assessment (2016).	Reject	No
Richard Herbert	360.1	Mapping / Mapping General / Mapping General	Amend	Supports the retention of SNAs as proposed originally, before the Councillor amendment to remove SNAs from residential zones in June 2022.	Amend Significant Natural Areas to re-instate on Residential Zones, as proposed prior to the Councillor Amendment to remove Significant Natural Areas from Residential Zones in June 2022.	Reject	No
Te Kamaru Station Ltd Ratings	362.1	Mapping / Mapping General / Mapping General	Amend	Considers that SNAs should not be on private property.	Seeks Significant Natural Areas layer to remove Significant Natural Areas on private property in both urban and rural environments. [Inferred decision requested].	Reject	No
M&P Makara Family Trust	FS41.26	Mapping / Mapping General / Mapping General	Oppose	The PDP as notified allows for 10 guests per night in temporary accommodation for one residential unit, and any number greater than this is sufficiently covered by the discretionary framework. The PDP as notified retains the existing one household per allotment which is sufficient to encourage larger blocks to place that unit where it is most easily accessible or useful for their purposes. Any number greater than this is sufficiently covered by the resource consent framework. M&P Trust also submits that the intent of the subdivision provisions in the Rural Area, including their time-related requirement, is to anticipate a lower rate of residential development in than urban areas. Allowing more than one residential unit per allotment defeats the purpose of these subdivision provisions. Any number greater than this is sufficiently covered by the resource consent framework.	Disallow	Accept	No
Te Kamaru Station Ltd Ratings	362.2	Mapping / Mapping General / Mapping General	Amend	Considers that Items WC037, WC042, WC047, WC049, WC050, WC119, WC120 and WC121 should be removed from SCHED8 as it is arbitrarily imposed. The imposition of SNAs will put at risk the voluntary and co-operative conservation programme Te Kamaru Station has made with Capital Kiwi. The programme works to ensure the rural landscape is fit for the return of kiwi. Negative impacts from this SNA may lead Te Kamaru Station to withdraw from the programme, should the legislative risk remain or worsen.	Remove SNA overlay at: - Fee Simple, 1/1 - Lot 2 Deposited Plan 375401 - Section 66, 74, 76-77, 79, 84 Terawhiti District - Part Section 13 Makara District - Part Section 18, 27-28, 54, 60-65, 73, 75, 78, 80-82 Terawhiti District - Lot 3 Deposited Plan 477282, 15, 650, 824 m2 [Refer to original submission for full list]	Reject	No
WCC Environmental Reference Group	377.3	Mapping / Mapping General / Mapping General	Amend	Considers that Schedule 8 should include all the SNAs identified in the draft district plan version provided to the Council’s environment committee from officers. “Wellington, wild at heart” is what our unique capital city trades upon - and as the population grows and urban areas densify, preserving and enhancing significant natural areas will become increasingly important. Research shows that access to natural areas, and ‘biophilic’ environments are keys to human health and well-being and are a critical part of protecting biodiversity. On this matter, Wellington as a city is playing a critical role in providing refuge for formerly at risk native birds, e.g. kaka, and with efforts such as the Halo Project and Predator Free initiatives being undertaken by thousands of Wellingtonians, it is important our city’s district plan provides legal and policy support to this. The failure to include SNA areas in residential zones means that the district plan is not in accordance with section 6 of the RMA, nor is it giving effect to relevant provisions of GWRC’s regional policy statement and regional plan.	Seeks that Significant Natural Areas layers are added all the SNA areas in the residential zones recommended by officers in the draft district plan version provided to the Council’s environment and planning committee on June 23, 2022.	Reject	No
Wellington Civic Trust	FS83.31	General / Mapping / Mapping General / Mapping General	Support	Wellington Civic Trust supports this submission as the existence of SNAs on private land contributes considerably to the character, amenity and attractiveness of the city, as well as its ecological sustainability and climate change resilience.	Allow	Reject	No
Director-General of Conservation	385.8	Mapping / Mapping General / Mapping General	Amend	Considers necessary additional provisions to recognise that unmapped areas that meet SNA criteria are still to be managed appropriately as required by section 6(c) of the Resource Management Act 1991.	Amend the Proposed District Plan to recognise areas that are not mapped but meet the criteria for SNAs stated in the RPS are to be managed in accordance with section 6(c) of the Resource Management Act 1991. For example, wetlands and the habitats of At-Risk or Threatened indigenous fauna.	Reject	No
Transpower New Zealand Limited	FS29.1	General / Mapping / Mapping General / Mapping General	Oppose	While Transpower understand the intent of the submission, it supports the identification and mapping on SNA’s on the basis it provides certainty for plan users. On that basis, the relief sought by the submitter is opposed.	Disallow	Accept	No
Kāinga Ora – Homes and Communities	FS89.52	General / Mapping / Mapping General / Mapping General	Oppose	Further clarification is needed to understand the implications on land use opportunities of applying significant natural areas. Kāinga Ora supports the protection of the values of SNAs but seeks that these are mapped and identified in the District Plan.	Disallow	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Terawhiti Farming Co Ltd (Terawhiti Station)	411.1	Mapping / Mapping General / Mapping General	Amend	Oppose SNAs on private property. Considers that sites have been incorrectly identified. Considers that a regulatory regime puts voluntary conservation programmes at risk. [See original submission for full reasons]	[Inferred decision requested] Seeks that significant natural areas do not apply to privately owned land.	Accept	No
VicLabour	414.10	Mapping / Mapping General / Mapping General	Amend	Considers Significant Natural Areas are important in order to protect our environment and native plantlife. Considers that while the city is built denser, the environment and our wildlife should be protected. Considers that it is ironic that the argument for being anti-density is to protect the 'character' of our housing but yet there is no consideration for the 'character' of our nature, which is arguably much harder to restore than the character amenity gained from what the Council deems as character housing.	Seeks that significant natural areas provisions apply to residentially zoned sites.	Reject	No
Chris Horne, Sunita Singh, Julia Stace, Paul Bell-Butler	456.2	Mapping / Mapping General / Mapping General	Amend	Considers that SNA-status should be restored to all residential-zoned properties. In particular considers that the Planning and Environment Committee vote to remove SNAs from all residential-zoned properties over-ride the purpose of the ECO chapter which "... is to identify significant natural areas within Wellington City in order to protect and maintain the remaining areas of indigenous biodiversity".	Amend mapping of Significant Natural Areas to include all residential-zoned properties.	Reject	No
Grant and Marilyn Griffiths, Griffiths Family Trust	460.1	Mapping / Mapping General / Mapping General	Amend	Opposes Significant Natural Areas on Private land.	Seeks to remove all Significant Natural Areas from Private Land.	Reject	No
Smith Geursen	475.1	Mapping / Mapping General / Mapping General	Amend	Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas fit the description in WC135 and should be protected as a SNA. Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA. Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA. Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA. Considers that some parts of the site have been cleared recently, as a complying activity, and as such do not represent the habitat that would benefit from protection. These areas should be excluded from the SNA as the ecological value is now largely lost. [Refer to original submission for full detail, including diagrams].	Seeks that the mapping for the extent of the area encompassed by WC135 (Carey Gully scrub and shrubland, South Coast) in SCHED8 - Significant Natural Areas is altered to: - Encompass the 3m+ vegetation that is north and west of the loop shaped farm track; and - Also encompass the stand of 3m+ vegetation in the centre to the south of the site. The new boundaries suggested for WC135 are approximated in Figure 8 in the submission.	Accept in part	yes
John Mulholland	497.2	Mapping / Mapping General / Mapping General	Amend	Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas fit the description in WC135 and should be protected as a SNA. Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA. Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA. Considers that parts of the area encompassed by WC135 in SCHED8 - Significant Natural Areas appear to have not met the description in WC135 for decades and should not be protected as a part of the SNA. Considers that some parts of the site have been cleared recently, as a complying activity, and as such do not represent the habitat that would benefit from protection. These areas should be excluded from the SNA as the ecological value is now largely lost. [Refer to original submission for full detail, including diagrams].	Seeks that the mapping for the extent of the area encompassed by WC135 (Carey Gully scrub and shrubland, South Coast) in SCHED8 - Significant Natural Areas is altered to: - Encompass the 3m+ vegetation that is north and west of the loop shaped farm track; and - Also encompass the stand of 3m+ vegetation in the centre to the south of the site. The new boundaries suggested for WC135 (Carey Gully scrub and shrubland, South Coast) are approximated in Figure 8 in the submission.	Accept in part	yes
Rod Halliday	25.10	Mapping / Rezone / Rezone	Amend	Considers that the mapped SNAs within the Lincolnshire development area that have already been consented for earthworks and subdivision under SR416511 have already been identified to achieve development so it makes no sense to keep them. [Refer to map in original submission for details]	Amend the Significant Natural Area overlay of the Lincolnshire Farm Development Area to remove those Significant Natural Areas already consented for earthworks and subdivision under the resource consent WCC SR No. 416511.	Reject	No
Thomas Brent Layton	164.3	Mapping / AllOverlays / Overlays General	Amend	Considers that the SNA overlay should be removed from the mapping.	Remove the Significant Natural Areas overlay from the mapping.	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Karepa Dell Developments	241.3	Mapping / AllOverlays / Overlays General	Oppose	Opposes the Significant Natural Area overlay applying to 11 Makomako Road.	Opposes Significant Natural Area overlay applying to 11 Makomako Road.	Accept	No
Horokiwi Quarries Ltd	271.9	Mapping / AllOverlays / Overlays General	Amend	Considers that there is a restrictive policy and rule framework that would apply to SNAs (and in particular where the sites are within a Coastal Environment overlay) and wishes to ensure any sites that are identified are in fact warranted as significant areas. Horokiwi does have concerns with particular areas on both its site and on the adjoining land to the west, in terms of whether the biodiversity values merit the specific areas being identified as SNAs. Based on the independent ecological assessment, Horokiwi seeks amendment to the SNA area identified. [Refer to original submission for full reason, including attachments]	Seeks that the Significant Natural Area overlay be amended as it relates to the Horokiwi quarry site including to remove the SNA from the Horokiwi site which is subject to the existing use certificate reference 1048648. [Refer to original submission, including figure and attachments]	Accept in part	Yes
Kilmarston Developments Limited and Kilmarston Properties Limited	290.13	Mapping / AllOverlays / Overlays General	Amend	Considers the removal of Significant Natural Area (SNA) overlay from this area appropriate as this will potentially be restrictive of development.	Seeks to remove proposed Significant Natural Area (SNA) from the overlay from Huntleigh Park Way (Road).	Reject	No
Adam Groenewegen	FS46.11	General / Mapping / AllOverlays / Overlays General	Oppose	Opposes the proposal to lift the SNA overlay on the unformed portion of Huntleigh Park Way. This land is owned by WCC for public use. If Kilmarston Development were to resubmit a new landuse/subdivision plan access to that subdivision using Huntleigh Park Way can be considered as part of the process with a better understanding of the value of the vegetation that exists on that site. As permission from WCC would be required to form the road to support subdivision earthworks an additional step of resource consent for vegetation clearance would be of little consequence.	Disallow / Disallow that part of the submission that seeks to enable a large reservoir to be built in NOSZ or on land that is proposed to be NOSZ.	Accept	No
Jo McKenzie	FS64.11	General / Mapping / AllOverlays / Overlays General	Oppose	Jo McKenzie opposes the proposal to lift the SNA overlay on the unformed portion of Huntleigh Park Way. This land is owned by WCC for public use. Considers that if Kilmarston Development ever resubmit a new landuse/subdivision plan access to that subdivision using Huntleigh Park Way can be considered as part of the process with a better understanding of the value of the vegetation that exists on that site. Considers that as permission from WCC would be required to form the road to support subdivision earthworks an additional step of resource consent for vegetation clearance would be of little consequence.	Disallow / Disallow the part of the submission that seeks to enable a large reservoir to be built in a NOSZ or on land that is proposed to be NOSZ.	Accept	No
Royal Forest and Bird Protection Society of New Zealand Inc	FS85.23	General / Mapping / AllOverlays / Overlays General	Oppose	As per above. We oppose arbitrary removal of the SNA overlay from the Huntleigh Park Way paper road on the basis that it's inconvenient and may potentially be restrictive of development. Due process needs to be undertaken to ensure compliance with s6(c) and relevant RPS policies.	Disallow	Accept	No
Andy Foster	FS86.48	General / Mapping / AllOverlays / Overlays General	Oppose	Considers that it is not reasonable to allow for housing development to intrude into the land zoned Open Space and Rural in the Operative Plan. The landscape impacts would be substantial, both of any housing and of the roading access. The impacts on vegetation would also be significant. Notes that the area of bush at the bottom of the site, immediately adjacent to and climbing up from Silverstream Road is of particularly high quality. The concept of putting housing or an access road through it would be entirely unreasonable. For all these reasons Andy Foster opposes any development in this area beyond a carefully designed reservoir. [See original Further Submission for full reasoning]. [Inferred reference to submission 290.13]	Disallow	Accept	No
Kilmarston Developments Limited and Kilmarston Properties Limited	290.17	Mapping / AllOverlays / Overlays General	Amend	Considers that It is important that Council identified SNAs within the City in order to protect and maintain the remaining areas of indigenous biodiversity. However, this should not include areas earmarked for public access and roads. The Submitter accepts the overlay being clipped to the proposed MRZ areas of their land, but not over the paper road and parts of the access.	Remove significant natural area overlay from paper road identified as Huntleigh Park Way.	Reject	No
Adam Groenewegen	FS46.12	General / Mapping / AllOverlays / Overlays General	Oppose	Opposes the proposal to lift the SNA overlay on the unformed portion of Huntleigh Park Way. This land is owned by WCC for public use. If Kilmarston Development were to resubmit a new landuse/subdivision plan access to that subdivision using Huntleigh Park Way can be considered as part of the process with a better understanding of the value of the vegetation that exists on that site. As permission from WCC would be required to form the road to support subdivision earthworks an additional step of resource consent for vegetation clearance would be of little consequence.	Disallow / Disallow that part of the submission that seeks to enable a large reservoir to be built in NOSZ or on land that is proposed to be NOSZ.	Accept	No
Jo McKenzie	FS64.12	General / Mapping / AllOverlays / Overlays General	Oppose	Jo McKenzie opposes the proposal to lift the SNA overlay on the unformed portion of Huntleigh Park Way. This land is owned by WCC for public use. Considers that if Kilmarston Development ever resubmit a new landuse/subdivision plan access to that subdivision using Huntleigh Park Way can be considered as part of the process with a better understanding of the value of the vegetation that exists on that site. Considers that as permission from WCC would be required to form the road to support subdivision earthworks an additional step of resource consent for vegetation clearance would be of little consequence.	Disallow / Disallow the part of the submission that seeks to enable a large reservoir to be built in a NOSZ or on land that is proposed to be NOSZ.	Accept	No
Royal Forest and Bird Protection Society of New Zealand Inc	FS85.27	General / Mapping / AllOverlays / Overlays General	Oppose	As per above. We oppose arbitrary removal of the SNA overlay from the Huntleigh Park Way paper road on the basis that it's inconvenient and may potentially be restrictive of development. Due process needs to be undertaken to ensure compliance with s6(c) and relevant RPS policies.	Disallow	Accept	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Andy Foster	FS86.51	General / Mapping / AllOverlays / Overlays General	Oppose	Considers that it is not reasonable to allow for housing development to intrude into the land zoned Open Space and Rural in the Operative Plan. The landscape impacts would be substantial, both of any housing and of the roading access. The impacts on vegetation would also be significant. Notes that the area of bush at the bottom of the site, immediately adjacent to and climbing up from Silverstream Road is of particularly high quality. The concept of putting housing or an access road through it would be entirely unreasonable. For all these reasons Andy Foster opposes any development in this area beyond a carefully designed reservoir. [See original Further Submission for full reasoning]. [Inferred reference to submission 290.17]	Disallow	Accept	No
Terawhiti Farming Co Ltd (Terawhiti Station)	411.3	Mapping / AllOverlays / Overlays General	Oppose	Considers that WCC's landscape-scale overlays are an affront to Terawhiti Station. Considers that the Council is not cooperative. Right from the very start of the SNA process all the overlays were set down. Cosniders decisions are already determined. [See original submission for full reasons]	Not specified	Reject	No
Paul M Blaschke	435.3	Mapping / AllOverlays / Overlays General	Amend	Considers that the SNA overlay should extend to residentially zoned areas.	Extend the Significant Natural Area overlay to relevant residentially zoned properties.	Reject	No
Tyers Stream Group	221.4	Other / Other / Other	Amend	TSG has been in contact with other community bodies which have explained how they can assist in development and provision of walking access, but only where this can be identified and connected through Council action. At present, the Tyers Stream Reserve is not adequately connected to residential Khandallah.	Seeks that public access to, along and within Tyers Stream Reserve be developed by WCC in line with its policies on public access.	Accept in part	No
Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.1	Other / Other / Other	Amend	[No specific reason given beyond decision requested - refer back to original submission]	Seeks planting around natural water courses and on steep contours to maintain the steep hillsides under severe weather events.	Reject	No
Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.3	Other / Other / Other	Amend	[No specific reason given beyond decision requested - refer back to original submission]	Seeks protection of the Porirua Stream.	Accept in part	No
Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.4	Other / Other / Other	Amend	[No specific reason given beyond decision requested - refer back to original submission]	Seeks protection of the Te Awarua-o-Porirua Harbour.	Accept in part	No
Tawa Community Board	294.2	Other / Other / Other	Not specified	Considers that passing the baton to GWRC in providing the minimum setback measure does not address the problems caused by the intersection between GWRC and WCC responsibilities in this transitional space along the stream edge.	Seeks that the Proposed District Plan includes more stringent measures to provide greater protection against increased erosion events along the Porirua Stream.	Accept in part	No
Cheryl Robilliard	409.2	Other / Other / Other	Support	[No specific reason given beyond decision requested - see original submission]	Seeks the relief requested by submitter Paul Forrest with respect to ecosystems in the context of densification and green corridors and biodiversity within the inner city and inner city suburbs Mt Victoria and Newtown.	Accept	No
Paul M Blaschke	435.1	Other / Other / Other	Oppose	The decision from Council's Planning & Environment Committee to remove SNAs from all residentially zoned properties on 23 June 2022 is opposed. This decision renders the Ecosystems and Indigenous Biodiversity section much less effective than it could and should be. It greatly hinders the achievement of Council's Te Atakura blueprint and other moves towards sustainability and resilience. It disadvantages the great majority of the city's residents except for a tiny number of suburban residential landowners who become privileged over all others including other suburban residential landowners with portions of SNAs within their properties and who have welcomed or not objected to the provisions. It overturns the very good process adopted by the council team and consultants who have planned and undertaken the SNA survey and policy development. Finally, it renders ECO-01, ECO-P1, ECO-P2, and ECO-P3, and the rules supporting these objectives and policies, incapable of being properly implemented, and perpetuates the uncertainty caused by lack of a comprehensive statutory process around significant areas and indigenous biodiversity. [Refer to original submission for full reason]	Opposes the decision from Council's Planning & Environment Committee to remove Significant Natural Areas from all residentially zoned properties.	Reject	No
Chris Horne, Sunita Singh, Julia Stace, Paul Bell-Butler	456.1	Other / Other / Other	Support	Supports the protection of indigenous plant communities for their own sake and for their carbon-sequestration function. This is of increasing importance in the battle to limit global climate change and rising sea levels.	Not specified.	Accept	No
David Edmonds	David Edmonds FS22.1		Oppose	In paragraph 6 of their submission, Forest and Bird submit that "residential SNAs and the provisions that protect them be reinserted in the Plan". The further submitter agrees with the approach adopted by the Council omitting residential SNAs from the Plan. Reinstatement of SNAs over residentially zoned lots would put unnecessary controls over people who for the most part nurture and protect native bush on their properties.	Seeks that Council retain SNAs as shown in the Proposed Plan, subject to fine tuning identified in their original submission (1). Does not want the Council to include any residential lots as part of the SNAs or any vegetation clearance rules in the District Plan.	Accept	No
Graeme Doherty	Graeme Doherty FS78.1		Oppose	Support the aspects of the PDP that show Significant Natural Areas and Significant Amenity Landscape on 76 Silverstream Road and 16 Patna Street and therefore I oppose the current outer residential zone for 76 Silverstream Road and 16 Patna Street and oppose the proposed Medium Density Residential Zone for the same locations. The proposal 290 is inconsistent with the Climate Change Response Act and in contradiction to Sections 5, 6 and 7 of the RMA.	Disallow the submission in its entirety.	Reject	No

Submitter Name	Sub No / Point No	Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Officers Recommendation	Changes to PDP?
Paul Blaschke	Paul Blaschke	FS129.16	Support	Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".	Allow	Reject	No