

**Proposed Change 1 to the Natural Resources Plan –  
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## ARA POUTAMA AOTEAROA THE DEPARTMENT OF CORRECTIONS FURTHER SUBMISSION ON PLAN CHANGE 1 TO THE NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION

**To:** Greater Wellington Regional Council  
PO Box 11646  
Wellington 6011

Email: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

**Submitter:** Ara Poutama Aotearoa the Department of Corrections  
Private Box 1206  
Wellington 6140

Attention: Andrea Millar – Manager, Resource Management and Land Management

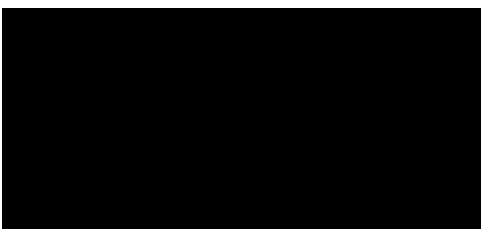
Phone: [REDACTED]

Email: [andrea.millar@corrections.govt.nz](mailto:andrea.millar@corrections.govt.nz)

Ara Poutama Aotearoa the Department of Corrections (**Ara Poutama**) makes further submissions on Plan Change 1 (**PC1**) to the Natural Resources Plan for the Wellington Region (**NRP**) in the **attached** document.

Ara Poutama, as a Central Government agency administering custodial and non-custodial corrections services in the Wellington region, has an interest in PC1 greater than the interest of the general public.

Ara Poutama would like to be heard in support of its further submission at a hearing. If others make a similar submission, Ara Poutama will consider presenting a joint case with them at the hearing.



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**Andrea Millar – Manager, Resource Management and Land Management**

For and on behalf of Ara Poutama Aotearoa the Department of Corrections

Dated this 8th day of March 2024.

Submitter that Ara Poutama are further submitting on	Submission no and point	Support or oppose	Submission description	Reason for support or opposition	Decision sought
Forest and Bird	S261.063	Oppose in part	Amend Policy WH.P2 Supports prohibition of unplanned greenfield development, however opposes clause (a). Considers financial contributions as compensatory measures for stormwater contamination contrary to RMA s107, the NZCPS, and the effects management hierarchy under the NPSM. Considers financial contributions are not an "offset". Considers livestock should be excluded from ephemeral watercourses, estuaries, and wetlands, as they have high ecological value. Considers additional direction is required to give clear scope for managing rural land uses.	Ara Poutama opposes the amendments requested to clause (a) of policy WH.P2. Ara Poutama opposes the request to include a new clause: "(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited". With respect to the amendments requested to clause (a), Ara Poutama opposes these on the basis that they are inconsistent with the decision requested by Ara Poutama on clause (a). With respect to the new clause (i) requested, Ara Poutama opposes this on the basis that the phrase "may lead to a decline in water quality" is uncertain in terms of the range of land use activities that it may apply to.	Disallow in part
Forest and Bird	S261.073	Oppose	Amend Policy WH.P11 Considers higher levels of control (i.e. consents) are required where stormwater is coming from a high risk location.	Ara Poutama opposes the request to amend policy WH.P11 to require resource consent for all discharges of stormwater from high risk industrial or trade premises. Subject to its submissions on the rules for discharges from high risk industrial or trade premises, Ara Poutama considers that it is reasonable to provide for these discharges as a permitted activity, subject to appropriate standards.	Disallow
Forest and Bird	S261.075	Oppose in part	Amend Policy WH.P14 Considers reducing adverse effects to "the extent practicable" enables cost considerations to be factored into decision-makers, which often avoid more environmentally responsible approaches. Considers reference to "where possible" is required.	Ara Poutama opposes the request to amend policy WH.P14 to replace the word "practicable" with "possible". Replacing "practicable" with "possible" sets a high and potentially unachievable threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.	Disallow in part
Forest and Bird	S261.099	Oppose in part	Oppose Rule WH.R5 Considers greater Council oversight is required for elements of the rule, noting clause (h) is not sufficiently certain and enforceable for a permitted activity. Reclassify as a controlled activity. Include enforceable alternative standards. Considers higher activity status and adding clearer and enforceable standards are required to ensure compliance with RMA s70, and that cumulative significant adverse effects do not arise. Distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification. Require "water sensitive urban design" as a condition of consent, including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens.	Ara Poutama opposes the request to amend the activity status of stormwater discharge rule WH.R5 from permitted to controlled. Ara Poutama considers that it would not be efficient or effective to require resource consent for all discharges from new or redeveloped impervious surfaces.	Disallow in part
Forest and Bird	S261.142	Oppose in part	Amend Policy P.P2 Supports prohibition of unplanned greenfield development, however opposes clause (a). Considers financial contributions as compensatory measures for stormwater contamination contrary to RMA s107, the NZCPS, and the effects management hierarchy under the NPSM. Considers financial contributions are not an "offset". Considers livestock should be excluded from ephemeral watercourses, estuaries, and wetlands, as they have high ecological value. Considers additional direction is required to give clear scope for managing rural land uses.	Ara Poutama opposes the amendments requested to clause (a) of policy P.P2. Ara Poutama opposes the request to include a new clause: "(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited". With respect to the amendments requested to clause (a), Ara Poutama opposes these on the basis that they are inconsistent with the decision requested by Ara Poutama on clause (a). With respect to the new clause (i) requested, Ara Poutama opposes this on the basis that the phrase "may lead to a decline in water quality" is highly uncertain and potentially open-ended in terms of the range of land use activities that it may apply to.	Disallow in part
Forest and Bird	S261.153	Oppose	Amend Policy P.P11 Considers higher levels of control (i.e. consents) are required where stormwater is coming from a high risk location.	Ara Poutama opposes the request to amend policy P.P11 to require resource consent for all discharges of stormwater from high risk industrial or trade premises. Further to its submissions on the rules for discharges from high risk industrial or trade premises, Ara Poutama considers that it is reasonable to provide for these discharges as a permitted activity, subject to appropriate standards.	Disallow
Forest and Bird	S261.155	Oppose in part	Amend Policy P.P13 Considers reducing adverse effects to "the extent practicable" enables cost considerations to be factored into decision-makers, which often avoid more environmentally responsible approaches. Considers reference to "where possible"	Ara Poutama opposes the request to amend policy P.P13 to replace the word "practicable" with "possible". Replacing "practicable" with "possible" sets a high and potentially unachievable threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.	Disallow in part

Submitter that Ara Poutama are further submitting on	Submission no and point	Support or oppose	Submission description	Reason for support or opposition	Decision sought
			is required.		
Forest and Bird	S261.176	Oppose in part	<p>Oppose Rule P.R5</p> <p>Considers greater Council oversight is required for elements of the rule, noting clause (h) is not sufficiently certain and enforceable for a permitted activity. Reclassify as a controlled activity.</p> <p>Include enforceable alternative standards.</p> <p>Considers higher activity status and adding clearer and enforceable standards are required to ensure compliance with RMA s70, and that cumulative significant adverse effects do not arise.</p> <p>Distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification.</p> <p>Require "water sensitive urban design" as a condition of consent, including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens.</p>	<p>Ara Poutama opposes the request to amend the activity status of stormwater discharge rule P.R5 from permitted to controlled.</p> <p>Ara Poutama considers that it would not be efficient or effective to require resource consent for all discharges from new or redeveloped impervious surfaces.</p>	Disallow in part

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.


## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Ātiawa ki Whakarongotai Charitable Trust
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	taiao@teatiawakikapiti.co.nz
Phone: (Optional)	
Contact person for submission: (If different to above)	Frank Hippolite (CEO)
I wish to be heard in support of my submission at a hearing:	No
I would consider presenting a joint case at the hearing with others who	Yes

make a similar submission:	
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	Yes / No
Specify the reasoning behind why you qualify for either of these above options:	Ātiawa ki Whakarongotai Charitable Trust inherits the responsibility for maintaining and progressively promoting the generational values of our tūpuna to express kaitiakitanga as mana whenua.

<b>3. For the further submitter to action</b>
<p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		14/02/2024
<p><b>Public information:</b></p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.</p> <p>You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul> </li> </ul>

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<p><b>*Submitter name or, Submitter number of the submission you are commenting on:</b></p>	<p><b>*Submission point number:</b> <i>Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:</i></p>	<p><b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i></p>	<p><b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i></p>	<p><b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
<p>S216 Ngāti Toa Rangatira</p>	<p>S216.003-004</p>	<p>Not stated</p>	<p>Allow</p>	<p>003 - Considers the Te Whanganui a Tara and Te Awarua o Porirua planning frameworks implement the NPS-FM, the Ngāti Toa Statement on the Te Awarua o Porirua Whaitua and Te Mahere Wai for the Te Whanganui a Tara Whaitua. Considers for the first time cultural health of Te Awarua o Porirua and Te Whanganui a Tara is of central importance and there is a pathway towards wai ora involving respect for taonga, restoration of mauri, ecological health, mahinga kai and kaimoana.</p> <p>004 - Considers the new provisions set new targets and standards for coastal water, nationally threatened freshwater species, groundwater, water quality, habitats, water quantity, and ecological processes of rivers. Submitter is committed to working with the local authorities and Wellington Water Ltd to</p>	<p>Support the intent of general comments.</p> <p>Support partnership with mana whenua in planning frameworks and implementation.</p>



				make these targets achievable especially in relation to stormwater and wastewater discharge consents.	
	S216.005	Amend	Allow	Clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by this rule and the appropriate rule category. Submits that the plan change should be amended to provide a more balanced and nuanced approach with regard to managing the tension between restricting urban sprawl and provision for practical flexibility for development in nonurban areas. Amend WH.P2(a) to state: Restricting prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.	Support the intent for clarity. Supports a dedicated planning approach to development in the Wellington Region.  Supports that urban sprawl should be avoided when it results in poor environmental outcomes.  Supports that there a need to clarify the provisions relating to 'unplanned greenfield development' and the type of activities captured by this rule and the appropriate rule category.
S286 Taranaki Whānui	S286.002	Not Stated	Allow	Add definition for Papakāinga: Any activity undertaken in the traditional rohe of tangata whenua to sustain themselves, which is on land held under Te Ture Whenua Māori Act 1993, or on land where there is an ancestral connection to the land and the land will remain in Māori ownership in the long term. Papakāinga includes residential activities and	Support the definition to provide clarity.

				commercial activities that provide employment and / or income to support those living in the papakāinga as well as (but not be limited to): social, cultural, economic, conservation and recreation activities, marae, wāhi tapu and urupā.	
	S286.003	Not Stated	Allow	Supports targets and timeframes with respect to contaminants, but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Concerned that this target will not be achievable with current funding mechanisms. Considers there is a need to prioritise and progress a programme of new streams of funding not reliant on existing ratepayer base.	Support funding mechanisms in principle to achieve targets and timeframes and appropriate infrastructure investment.
	S286.006	Not Stated	Allow	Notes the huanga of mahinga kai in Schedule B has not been updated following the Whaitua process and publication of Te Mahere Wai o Te Kāhui Taiao.  Seeks amendment of Schedule B in consultation with mana whenua to fully reflect mahinga kai values and outcomes, including those expressed in Te Mahere Wai o Te Kāhui Taiao.	Support amendment of Schedule B in consultation with mana whenua to fully reflect mahinga kai values and outcomes.
	S286.010-011-012	Support	Allow	Supports Freshwater action plans to achieve objectives	Support Freshwater action plans.  Support action plans to achieve Parangarahu Lakes objectives - Support partnership with mana whenua.

					Support development of a Freshwater Action Plan for nationally threatened freshwater species – Supports partnership with mana whenua.
	S286.013	Support	Allow	Supports fish passage action plans, identification and remediation of barriers to fish passage	Support fish passage action plans, identification and remediation of barriers to fish passage.  Support partnership with mana whenua.
	S286.014	Support	Allow	Identifying and responding to degradation in freshwater bodies	Support monitoring, identifying and addressing causes of any degradation in freshwater bodies.  Support partnership with mana whenua.
	S286.015-016	Amend	Allow	Supporting the health of urban waterbodies  Supporting the health of rural waterbodies.	Support in principle the inclusion of timeframes for clarity.
	S286.017	Amend	Allow	Funding of wastewater and stormwater network upgrades requires timeframes.	Support in principle funding of wastewater and stormwater network upgrades with timeframes for clarity.
	S286.018	Amend	Allow	Improve progressively to wai ora state.  Amend objective as follows: Objective WH.O1 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is	Support in principle.

				<p>progressively improved and is wai ora by 2100.</p> <p>Note-In the wai ora state: • Āhua (natural character) is restored and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character • All freshwater bodies have planted margins • All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species • Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga • Mana whenua are able to undertake customary practices at a range of places throughout the catchment.</p>	
	S286.019	Amend	Allow	<p>Improve and restore health and wellbeing of groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora state.</p>	Support in principle.
	S286.020	Amend	Allow	<p>Supports full restoration of Te-Whanganui-a-Tara's waterways towards wai ora by 2040 but notes significant infrastructure investment is required by 2040 to meet the E.coli target. Submitter is concerned this target will not be</p>	Support in principle.

				achievable with current funding mechanisms. Considers it should be a priority to find new streams of funding that are not reliant on the existing ratepayer base and regular monitoring and reporting on progress towards the target is completed.	
	S286.021-022-023-024-025-026-027-028-029-030-031	Amend	Allow	Retain objective provided: -Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.	Support in principle.
	S286.032	Amend	Allow	Amend policy: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives. Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) <del>prohibiting unplanned greenfield development and for managing other</del> greenfield developments by minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d)	Support in principle.

				requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.	
	S286.033-034-035-036-037-038-039-040	Retain	Allow	Retain as notified	Support in principle.
	S286.041	Amend	Allow	Managing adverse effects of stormwater discharges - Develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Support in principle.
	S286.042	Support	Allow	Discharges of contaminants in stormwater from high risk industrial or trade premises - Retain as notified.	Support in principle.
	S286.043	Amend	Allow	Support in principle, but considers policy could be reworded to strengthen mana whenua values and to be consistent with wording of other policies.	Support in principle.

				Amend policy: Policy WH.P12: Managing stormwater from a port or airport The adverse effects, including on aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use, of t The discharge of stormwater from a port, or airport, where the discharge will enter water, including via a local authority or state highway stormwater network, shall be avoided or minimised by: (a) identifying priorities for improvement, including methods and timeframes for improvement, and (b) having particular regard to protecting sites with identified significant or outstanding values, and (c) implementing good management practice including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (d) where required to reduce localised adverse effects, or to meet the target attribute states and coastal water objectives, progressively improving discharge quality over time.(e) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule C (mana whenua) sites, or mahinga kai sites.	
	S286.044	Amend	Allow	Supports use of stormwater management strategies to achieve freshwater outcomes, particularly the prioritisation of	Support in principle.

				outcomes with regard to Schedule C (mana whenua) sites or mahinga kai.	
	S286.048-049-050-051	Amend	Allow	General wastewater policy to achieve target attribute states and coastal objectives - Retain policy provided: - Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and -regular monitoring and reporting is undertaken on progress towards the target.	Support in principle.
S085 Rangitāne o Wairarapa	S85.001	Oppose	Delete proposed rule	Considers long term consents for permanent diversion allows for review of the consent and effects, including consultation with mana whenua and other parties to ensure the diversion remains appropriate.	Support in principle.
	S85.002	Amend	Allow	Supports partnership directives for the creation of freshwater action plans. Suggests there is a role for mana whenua to measure and understand the effectiveness of actual outcomes in either pūtaiao or mātauranga Māori (which only Tangata whenua can do).  Amend to include "in partnership with tangata whenua" in the statement around monitoring the effectiveness of the Freshwater Action Plans.	Support in principle.  Support partnership with mana whenua.



	S85.003	Amend	Allow	<p>Supports proposed changes to beds of lakes and rivers rules to improve clarity. Concerned sites of significance to mana whenua not identified in Schedule C will not be protected.</p> <p>Amend to include requirement to consult with tangata whenua.</p>	<p>Support in principle.</p> <p>Support partnership with mana whenua.</p>
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# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

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- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

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2. You can use the Further Submission Form(s) (Form 6).
  - [This](#) Further Submission Form(s) (Form 6) – Microsoft Word version; or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version.](#)

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor.](#)
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.


## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	Rod.halliday@hrmlimited.co.nz
Phone: (Optional)	Insert
Contact person for submission: (If different to above)	Rod Halliday
I wish to be heard in support of my submission at a hearing:	Yes

I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Submitter Is affected by proposed provisions

<p><b>3. For the further submitter to action</b></p> <p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>
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<b>4. Disclosures:</b>	
<p>If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation</p>	 <p>08.03.24</p>

<p><b>Public information:</b> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>
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<p><b>5. Further Submission:</b></p> <ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: Suggested added text, shown as <b>bolded text</b> format Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul>
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#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

*Submitter name or, Submitter number of the submission you are commenting on:	*Submission point number:	*Provision	*Decision sought: <i>(Allow, Disallow, Allow in part, or Disallow in part)</i>	Decision sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>	Reasons: <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
S219 Cuttriss Consultants Ltd	S219.002 S219.003 S219.004 S247.002 S247.003 S247.004 S219.005 S247.005	Entire Document	Allow	Withdraw PC1	Agree that inadequate consultation was undertaken before PC1 was notified. As a result, PC1 is contrary to Subpart 1/Clause 3.2(1) of the NPS-FW which specifies that:  <i>“Every regional council <b>must engage with communities and tangata whenua</b> to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region.”</i>
S243 Land Matters Limited	S243.033 S243.034	Entire Document	Allow	Withdraw PC1	A draft should have been released for consultation with the community, including the development community. Doing so would limit appeals and ensure a more workable less idealistic document is prepared.
S219 Cuttriss Consultants Ltd	S219.001	General comments - definitions	Allow	Add definition of greenfield development	There is a disconnect between the outcomes being sought by TAs giving effect to the NPS-UD and PC1. Even though the NPS-FW and the NPS-UD have the same status under the RMA.  PC1 conflicts with the intended outcomes of the NPS-UD, being to provide for well-functioning urban environments, including both through infill, and greenfield developments. NPS-UD Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been adequately assessed.

S239 Orogen Limited	S239.002	General comments - definitions	Allow	Add definition of 'greenfield development'	<p>A definition of 'greenfield development' is required to provide certainty regarding the application of new rules particularly for the application of Rules WH.R6 and P.R6.</p> <p>The final definition should be prepared in consultation with relevant stakeholders.</p>
S219 Cuttriss Consultants Ltd	S219.002	General comments - overall	Allow	Withdraw PC1	<p>There is insufficient detail on the types of hydrological controls required for various types and scales of development.</p> <p>The standards pose significant burdens on property owners and developers.</p> <p>Engineering advice should not be necessary for the creation of small impervious areas.</p> <p>PC1 does not adequately evaluate financial costs on landowners, developers and ratepayers, including flow-on costs on the commercial viability of housing supply and affordability.</p>
S33 Wellington City Council	S33.005	General comments - stormwater management	Allow	Withdraw PC1	<p>The proposed framework for managing the effects of stormwater runoff from development is already or will be regulated through TA's district plans and this would lead to applicants going through two different consenting processes. Stormwater runoff from development should be regulated at the TA level only.</p>
S247 Carrus Corporation Ltd	S247.008	Unplanned greenfield development t	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	<p>The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent TAs from meeting their ongoing requirements under the NPS-UD.</p>
S33 Wellington City Council	S33.004 S33.018	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	<p>This provision is likely to lead to unintended consequences.</p> <p>Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.</p>

					<p>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</p> <p>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</p> <p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore prohibited activity status inappropriate.</p> <p>The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility due to not implementing the higher order documents, and any section 32 analysis would be at risk of identifying development as being contrary to objectives and policies in these plans.</p> <p>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</p>
S243 Land Matters Limited	S243.036	General comments - urban development –.	Allow	Remove the new requirements for stormwater management and financial contributions from all new stormwater discharge provisions or amended to provide a more balanced approach to catchment management.	<p>PC1 introduces increased uncertainty and cost to the provision of housing in Wellington region, directly affecting housing affordability.</p> <p>The requirement for financial contributions and risk cost introduced through additional consenting will have flow on effects to the cost of housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.</p>

S33 Wellington City Council	S33.003	General comments - water quality	Allow	Remove all requirements in relation to brownfield sites.	<p>WCC is already engaging in multiple statutory and non-statutory processes in processes to achieve water quality improvements.</p> <p>PC1 would require all brownfield development to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.</p>
S33 Wellington City Council	S33.013	Redevelopment - Support	Allow	<p>Amend the definition taking into account for the issues raised by the submitters.</p> <p>Delete all associated rules requiring additional consents from GW for consent for development.</p> <p>If the above is not done provided exemptions for maintenance, extensions and alterations. Make it clear that these rules do not apply when the redeveloped of site does not increase the permitted hard surfacing on the site ie: the current hard surfacing + and allowance provide for under the definition and/or rules.</p>	<p>The proposed definition is unreasonable. It does not take into consideration the need to intensify development in urban areas and overlaps with the functions of territorial authorities and the consideration for stormwater management as set out in 80E of the RMA and 3.5(4) of the NPS-FM.</p> <p>The definition does not work in the context of the NPS-UD and conflicts with the Policies of PC1. For example Policy WH.P2 seeks to "encourage" redevelopment, but associated provisions, including this definition do not permit the associated increases in impervious surfaces that would be expected with the use of this term in a policy.</p> <p>WH.R4 refers to "redevelopment of existing impervious surfaces" which implies that the definition of redevelopment is inclusive of maintenance of existing impervious surfaces.</p> <p>The definition should exclude minor alterations and additions to existing buildings to provide for the small redevelopment of existing sites as a permitted activity in associated rules.</p> <p>Except where required in relation to heritage buildings, zinc or copper roofs should be excluded from the final exception clause.</p>
S219 Cuttriss Consultants Ltd	S219.007	Redevelopment -	Allow		<p>Concerned about implications definition may have on business-as-usual activities undertaken by territorial authorities and infrastructure providers.</p>

					<p>What does “minor maintenance or repairs to roads, carparking areas, driveways and paving” mean?</p> <p>It is egregious to require 'like for like' replacements and renewals. Redevelopment of a site should be permitted provide the overall impervious surface area is not increased.</p>
S33 Wellington City Council	S33.097	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words “from new greenfield developments” and lowering all treatment targets.	<p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.</p> <p>TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.</p> <p>The proposed financial contribution will decrease housing affordability.</p> <p>A mandatory flat fee financial contribution may incentivise large lots over intensification.</p>
S219 Cuttriss Consultants Ltd	S219.012	Policy WH.P31: Winter shut down of earthworks.	Allow	Delete policy and make earthworks great than 3,000m <sup>2</sup> between 1 June and 30 September a Discretionary Activity.	<p>This policy is written in the form of a rule or standard rather than outlining how an objective will be implemented.</p> <p>The current method of site-specific assessments during winter works is achieving the objectives of the NPS-FW.</p> <p>Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.</p>
S239 Orogen Limited	S239.004	Policy WH.P31: Winter shut down of earthworks.	Allow		
S243 Land Matters Limited	S243.019	Policy WH.P31: Winter shut down of earthworks.	Allow		
S247 Carrus Corporation Ltd	S247.012	Policy WH.P31: Winter shut down of earthworks.	Allow		



S33 Wellington City Council	S33.060	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	Allow	Delete  If not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	<p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>PC1 Rule WH.R5 would require all brownfield developments to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.</p> <p>Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.</p> <p>Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.</p> <p>(a) Should be deleted as it discourages development of large brownfield sites. This is something which should be encouraged. Especially as GW is effectively preventing any future greenfield development.</p> <p>(b) Should be deleted as the materials used are controlled by TAs. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.</p> <p>(c) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.</p> <p>(c)(i) Is somewhat ironic. Why is it necessary to implement hydrological controls for greenfield development. when PC1 effectively bans them.</p>
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					<p>(c)(ii) applies equally to existing and new impervious surfaces &gt;30m<sup>2</sup>. So, in effect any redevelopment (eg relaying a section of a drive) or new work (installing a carpad) &gt;30m<sup>2</sup> would require a GW consent.</p> <p>Clause (c) is too vague as it does not specify what the hydrological controls have to achieve and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of impervious areas of 31m<sup>2</sup>.</p> <p>The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices.</p> <p>Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre- committed projects, and may impact upon their viability. This was not considered in the s32 analysis.</p>
S33 Wellington City Council	S33.138	Schedule 30: Financial Contributions	Allow	Delete Schedule 30.	<p>There should not be financial contributions on stormwater discharges. Including:</p> <p>TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.</p> <p>PC1 will have significant consequences for affordability of housing and land development in Wellington Region. The significant financial contribution for new residential units will have flow on housing affordability effects in the region and is inconsistent with Objective 2 and associated policies of NPS-UD. This has not been considered in the Section 32 report which ignores the housing affordability implications of the proposed changes.</p>
S243 Land Matters Limited	S243.032	Schedule 30: Financial Contributions.	Allow		
S247 Carrus Corporation Ltd	S247.032	Schedule 30: Financial Contributions.	Allow		

					<p>A mandatory flat fee financial contribution may incentivise large lots over intensification.</p> <p>The requirement for financial contributions and risk cost introduced through additional consenting will have flow on effects to the cost of housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.</p> <p>Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.</p> <p>It is not clear what the financial contributions will be used for. It is unreasonable to collect these contributions tax prior to consent being given effect to. This may make some developments non-viable exacerbating the current housing availability and affordability issues. The schedule also requires the tax be based on the number of EHU's expected to be delivered. This is impossible to predict if the application relates simply to earthworks.</p>
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8 March 2024

To: Greater Wellington Regional Council  
Environmental Policy  
PO Box 11646, Manners St  
Wellington 6142  
Attn: Hearings Advisor

By email: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

SLR Project N: 810.V16097.00001

**Further Submission on Proposed Plan Change 1 to the Natural  
Resources Plan for the Wellington Region**

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**Submitter:**

bp Oil New Zealand Limited  
PO Box 99 873  
Auckland 1149

Mobil Oil New Zealand Limited  
PO Box 1709  
Auckland 1140

Z Energy Limited<sup>1</sup>  
PO Box 2091  
Wellington 6140

Hereafter referred to as the **Fuel Companies**

**Address for Service:**

SLR Consulting New Zealand  
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Auckland 1142

Attention: Georgina McPherson

Phone: [REDACTED]

Email: [georgina.mcpherson@slrconsulting.com](mailto:georgina.mcpherson@slrconsulting.com)

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<sup>1</sup> On behalf of the wider Z group, including the Z Energy and Caltex operations in New Zealand.

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## Introduction

1. bp Oil New Zealand Limited, Mobil Oil New Zealand Limited, and Z Energy Limited (*the **Fuel Companies***) were a submitter (submitter number 258) on Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region.
2. The Fuel Companies' interest in the proposed plan is greater than the interest of the general public.
3. The Fuel Companies further submissions are as contained in the attached Table in **Schedule A**.
4. **The Fuel Companies wish to be heard in support of this submission.**
5. If others make similar submissions the Fuel Companies may be prepared to consider presenting a joint case with them at any hearing.
6. The Fuel Companies could not gain an advantage in trade competition through this submission.

Signed on behalf of bp Oil New Zealand Limited, Mobil Oil New Zealand Limited and Z Energy Limited



**Georgina McPherson**  
Principal Planning and Policy Advisor  
Email: [georgina.mcpherson@slrconsulting.com](mailto:georgina.mcpherson@slrconsulting.com)

**Attachments:** Schedule A: Fuel Companies' further submission to Proposed Plan Change 1 to the Natural Resources Regional Plan for the Wellington Region

## Schedule A: Fuel Companies Further Submissions and relief to Proposed Plan Change 1 to the Natural Resources Regional Plan for the Wellington Region

Name of person/group making original submission	Original submission number	Provision	Stance on the submission point:	Decision sought	Reason for position and relief sought
S151 Wellington Water	S151.08	Definition for Earthworks	Support	Allow submission and reinstate existing exclusions from the definition of 'earthworks' within Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua unless appropriate exclusions are carried over to the rules, in particular those exclusions relating to the laying and maintenance of underground pipes and the repair, sealing or resealing of a road, footpath, driveway.	Removal of the exclusions will result in a large number of consent requirements for minor earthworks activities and affect the ability to undertake routine maintenance and repair work on underground infrastructure and sealed areas in a timely and cost-effective manner.

<p>S151 Wellington Water Ltd</p>	<p>S151.020</p>	<p>Definition for High risk industrial or trade premise</p>	<p>Oppose</p>	<p>Disallow the submission and do not make the changes sought.</p>	<p>Inclusion of '<i>sites in relation to which the relevant stormwater discharge consents have not been granted and/or applied for</i>' under the definition of 'high risk industrial or trade premise' is opposed as it is unrelated to the level of risk and may capture sites that are not used for industrial or trade purposes.</p> <p>Inclusion of '<i>sites that have been used for the listed purposes in the past, and still generate contaminants in stormwater, but which are not currently used for any of those purposes</i>' in the definition of 'high risk industrial or trade premise' is also opposed. It is unclear how contaminants that are no longer present on the site would continue to be entrained in stormwater. There appears to be cross-over with contaminated land and passive discharge issues, which are already managed in a distinct way under the NRP.</p>
<p>S248 Ara Poutama Aotearoa the Department of Corrections</p>	<p>S248.013</p>	<p>Definition for High risk industrial or trade premise</p>	<p>Support</p>	<p>Allow submission and make the changes sought to the rules relating to new or redeveloped impervious surfaces at high risk industrial or trade premises.</p>	<p>Agree that provision should be made for a reasonable level of impervious surface development or redevelopment at high-risk industrial or trade premises as a permitted or controlled activity, subject to appropriate conditions to enable reasonable maintenance, upgrading or development in recognition that new or redeveloped impervious surfaces will perform better at containing hazardous substances than existing degraded surfaces.</p>



S257 Kāinga Ora	S257.006	Definition for Redevelopment	Support	Allow submission and make the changes sought.	Agree with submission S257.006 that reconstruction and replacement should be removed from the definition of 'redevelopment'.
S209 Enviro NZ Services Ltd	S209.003	Definition for Stormwater treatment system	Support	Allow submission and make the changes sought.	Agree that stormwater treatment systems will <u>reduce</u> contaminant loading but not necessarily entirely <u>remove</u> all contaminants.
S177 Transpower New Zealand Limited	S177.015	Rule R101: Earthworks - permitted activity.	Support	Allow submission and make the changes sought.	Existing Rule R101 provides reasonable conditions for undertaking 'all other earthworks' that are less than 3,000m <sup>2</sup> that are not otherwise permitted by WH.R23 and P.R22 and should continue to apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o Porirua Whaitua
S31 Stormwater360	S31.003	Table 8.4: Target attribute states for rivers.	Oppose	Disallow submission on the basis of uncertainty.	While the intent of the submission to achieve consistency throughout the rules and policies can be supported in principle, the specific changes sought to Table 1 and 2 of Schedule 28: Stormwater Contaminant Treatment to reflect dissolved metals, together with the implications of those changes, are uncertain.
S225 Upper Hutt City Council	S225.072	Policy WH.P7: Discharges to groundwater.	Support	Allow submission and make the changes sought.	Agree that the policy should be amended to clarify which discharges the policy relates to and the policy intent.





S225 Upper Hutt City Council	S225.075	Policy WH.P10: Managing adverse effects of stormwater discharges.	Support	Allow submission and make the changes sought.	Agree that policy should be amended to focus on stormwater networks rather than individual developments. This would assist in addressing overlap and inconsistency between the regional plan and district plans which are increasingly introducing regulation of stormwater discharges at the individual site level, including requirements around hydrological control, contaminant treatment and water sensitive design.
S33 Wellington City Council	S33.046	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces	Support	Allow submission and make appropriate changes to avoid overlap of regulation of stormwater	While both district and regional councils have a role to play in the management of stormwater discharges, the regulation of exactly the same matters at a district and regional level creates a huge administrative burden on a wide range of activities, does not appear to be clearly effects based, and confuses the relationship with other approval processes in relation to stormwater discharges including the district plans, the regional plan, the Wellington Water Regional Standard for Water Services and requirements for network operator approvals.
S257 Kāinga Ora	S257.019	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Allow submission and make the changes sought.	Policy should be amended to focus on those areas where contaminant loading is higher in recognition that not all impervious surfaces will necessarily hold contaminants



S101 Wellington International Airport Limited	S101.054	Policy WH.P29: Management of earthworks.	Support	Allow submission and make the changes sought.	It is unclear whether Policy WH.P29 is intended to apply just to Rural land use, in line with the heading in this section of the Plan Change, or to all earthworks. Any policy applying to earthworks in an urban setting should focus on managing the adverse effects, rather than risk of sediment discharges from earthworks.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.026	Policy WH.P29: Management of earthworks.	Support	Allow submission and make the changes sought.	The policy as currently worded is too absolute and does not recognise that even with implementation of best practice erosion and sediment control measures it may not always be practicable to retain all soil and sediment on site.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.027	Policy WH.P30: Discharge standard for earthworks.	Support	Allow submission and retain policy as sought	The standards set out in the policy are reasonable.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.031	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity	Support	Allow submission and make the changes sought.	Subject to the relief sought in the Fuel Companies own submission, expanding the scope of the rule to apply to both existing and new high risk industrial or trade premises is supported.



S33 Wellington City Council	S33.060	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow submission and make the changes sought.	Support intent of submission to avoid regulatory overlap of stormwater discharges at both a district and regional level. Such overlap creates higher consenting costs, is not effects based and confuses the relationship across other approval processes.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.032	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow submission and make the changes sought.	A discretionary activity status for any new or redevelopment of existing impervious surfaces at high risk industrial or trade premises is unduly onerous and may result in the delay of redevelopment projects and further deterioration of impervious surfaces, leading to increased risk of accidental release of contaminants or hazardous substances to the environment. Provision should be made for such work to be undertaken as a permitted activity, subject to appropriate standards.
S257 Kāinga Ora	S257.028	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow submission and make the changes sought.	Support applying the threshold to new or additional areas of impervious surface only and not to redevelopment and increasing the impervious surface threshold above 1,000m <sup>2</sup> .



S33 Wellington City Council	S33.062	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Support	Allow submission and make the changes sought.	Support intent of submission to avoid regulatory overlap of stormwater discharges at both a district and regional level. Such overlap creates higher consenting costs, is not effects based and confuses the relationship across other approval processes.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.034	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Support	Allow submission and make the changes sought.	A discretionary activity status for any new or redevelopment of existing impervious surfaces at high risk industrial or trade premises is unduly onerous and may result in the delay of redevelopment projects and further deterioration of impervious surfaces, leading to increased risk of accidental release of contaminants or hazardous substances to the environment. Provision should be made for such work to be undertaken as a controlled activity, subject to appropriate standards.



S33 Wellington City Council	S33.065	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Oppose	Reject submission in part and do not make the changes sought as they apply to discharges from high-risk trade and industrial premises.	Support intent of submission to avoid regulatory overlap of stormwater discharges at both a district and regional level. However, seek to ensure a consenting pathway remains available for high-risk trade and industrial premises to obtain their own discharge consent even where the discharge is through a local authority stormwater network. Without such a pathway, high-risk trade and industrial premises would be reliant on the relevant local authority network discharge consent to provide for stormwater discharges from the facility (including in relation to redevelopment of impervious surfaces at existing sites), many of which specifically exclude discharges from such sites and may need to be varied to allow for such discharges to occur.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.035	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support	Allow submission and make the changes sought.	Support provision for a reasonable level of new or redevelopment of impervious surfaces at high-risk trade or industrial premises under permitted and controlled activity rules WH.R5, WH.R6 and WH.R7 subject to appropriate conditions.



<p>S248 Ara Poutama Aotearoa the Department of Corrections</p>	<p>S248.036</p>	<p>Rule WH.R12: All other stormwater discharges - non-complying activity</p>	<p>Support</p>	<p>Allow submission and make the changes sought.</p>	<p>Support a discretionary, rather than non-complying, activity status as a default for stormwater discharges not complying with other rules, particularly in the context that small breaches of the permitted activity standards under WH.R2, WH.R3, and WH.R4 would trigger a non-complying status. In relation to WH.R4, it is noted that an existing high-risk industrial or trade premise that was unable to meet one of the permitted activity standards would default to NC under WH.R12, whereas a new site or redevelopment at an existing site requires discretionary consent under WH.R11. A non-complying activity status for discharges from an existing site is considered unduly onerous.</p>
<p>S151 Wellington Water Ltd</p>	<p>S151.099</p>	<p>Rule WH.R23: Earthworks - permitted activity.</p>	<p>Support</p>	<p>Allow submission and make the changes sought.</p>	<p>Consider it appropriate to carry over existing exemptions for minor earthworks such as those required for the laying, maintenance, upgrade and replacement of underground infrastructure and repair of existing paved areas. Rule WH.R23 as notified will result in consent requirements and associated costs for significant numbers of earthworks activities and is not reflective of the level of potential contaminates generated by small-scale earthworks undertaken with best practice erosion and sediment control measures in place.</p>



S177 Transpower New Zealand Limited	S177.041	Rule WH.R23: Earthworks - permitted activity.	Support	Allow submission and make the changes sought.	Support the relief sought as an effective way of resolving the conflict between clause (g) and the 'minor discharges' rule R91.
S177 Transpower New Zealand Limited	S177.042	Rule WH.R24: Earthworks - restricted discretionary activity	Support	Allow submission and make the changes sought.	Support the relief sought as consequential to the changes sought by S177 to Rule WH.R23, which are supported, subject to the relief sought in relation to WH.R24 in the Fuel Companies own submission.
S177 Transpower New Zealand Limited	S177.043	Rule WH.R25: Earthworks - non-complying activity.	Support	Allow submission and make the changes sought.	Consider a discretionary, rather than non- complying, activity status is appropriate in the event the standards in WH.R24 cannot be met, and there is insufficient evidence to justify a non-complying status.
S240 Porirua City Council S240.041	S240 Porirua City Council S240.041	Policy P.P10: Managing adverse effects of stormwater discharges.	Support	Allow submission and make the changes sought.	Agree that policy should be amended to avoid overlap between district and regional plan hydrological controls.



S33 Wellington City Council	S33.096	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Support in part	Allow submission and make appropriate changes to avoid overlap of regulation of stormwater	While both district and regional councils have a role to play in the management of stormwater discharges, the regulation of exactly the same matters at a district and regional level creates a huge administrative burden on a wide range of activities, does not appear to be clearly effects based, and confuses the relationship with other approval processes in relation to stormwater discharges including the district plans, the regional plan, the Wellington Water Regional Standard for Water Services and requirements for network operator approvals.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.050	Policy P.P27: Management of earthworks sites.	Support	Allow submission and make the changes sought.	The policy as currently worded is too absolute and does not recognise that even with implementation of best practice erosion and sediment control measures it may not always be practicable to retain all soil and sediment on site.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.051	Policy P.P28: Discharge standard for earthworks sites.	Support	Allow submission and retain policy as sought	The standards set out in the policy are reasonable.





S248 Ara Poutama Aotearoa the Department of Corrections	S248.055	Rule P.R4: Stormwater from an existing high risk industrial or trade premise - permitted activity	Support	Allow submission and make the changes sought.	Subject to the relief sought in the Fuel Companies own submission, expanding the scope of the rule to apply to both existing and new high risk industrial or trade premises is supported.
S33 Wellington City Council	S33.110	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow submission and make the changes sought.	Support intent of submission to avoid regulatory overlap of stormwater discharges at both a district and regional level. Such overlap creates higher consenting costs, is not effects based and confuses the relationship across other approval processes.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.056	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow submission and make the changes sought.	A discretionary activity status for any new or redevelopment of existing impervious surfaces at high risk industrial or trade premises is unduly onerous and may result in the delay of redevelopment projects and further deterioration of impervious surfaces, leading to increased risk of accidental release of contaminants or hazardous substances to the environment. Provision should be made for such work to be undertaken as a permitted activity, subject to appropriate standards.



S257 Kāinga Ora	S257.056	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow submission and make the changes sought.	Support applying the threshold to new or additional areas of impervious surface only and not to redevelopment and increasing the impervious surface threshold above 1,000m <sup>2</sup> .
S33 Wellington City Council	S33.112	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Support	Allow submission and make the changes sought.	Support intent of submission to avoid regulatory overlap of stormwater discharges at both a district and regional level. Such overlap creates higher consenting costs, is not effects based and confuses the relationship across other approval processes.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.058	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Support	Allow submission and make the changes sought.	A discretionary activity status for any new or redevelopment of existing impervious surfaces at high risk industrial or trade premises is unduly onerous and may result in the delay of redevelopment projects and further deterioration of impervious surfaces, leading to increased risk of accidental release of contaminants or hazardous substances to the environment. Provision should be made for such work to be undertaken as a controlled activity, subject to appropriate standards.



S33 Wellington City Council	S33.115	Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Oppose in part	Reject submission in part and do not make the changes sought as they apply to discharges from high-risk trade and industrial premises.	Support intent of submission to avoid regulatory overlap of stormwater discharges at both a district and regional level. However, seek to ensure a consenting pathway remains available for high-risk trade and industrial premises to obtain their own discharge consent even where the discharge is through a local authority stormwater network. Without such a pathway, high-risk trade and industrial premises would be reliant on the relevant local authority network discharge consent to provide for stormwater discharges from the facility (including in relation to redevelopment of impervious surfaces at existing sites), many of which specifically exclude discharges from such sites and may need to be varied to allow for such discharges to occur.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.059	Rule P.R10: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support	Allow submission and make the changes sought.	Support provision for a reasonable level of new or redevelopment of impervious surfaces at high-risk trade or industrial premises under permitted and controlled activity rules WH.R5, WH.R6 and WH.R7 subject to appropriate conditions.



<p>S248 Ara Poutama Aotearoa the Department of Corrections</p>	<p>S248.060</p>	<p>Rule P.R12: All other stormwater discharges - non-complying activity</p>	<p>Support</p>	<p>Allow submission and make the changes sought.</p>	<p>Support a discretionary, rather than non-complying, activity status as a default for stormwater discharges not complying with other rules, particularly in the context that small breaches of the permitted activity standards under WH.R2, WH.R3, and WH.R4 would trigger a non-complying status. In relation to WH.R4, it is noted that an existing high-risk industrial or trade premise that was unable to meet one of the permitted activity standards would default to NC under WH.R12, whereas a new site or redevelopment at an existing site requires discretionary consent under WH.R11. A non-complying activity status for discharges from an existing site is considered unduly onerous.</p>
<p>S151 Wellington Water Ltd</p>	<p>S151.130</p>	<p>Rule P.R22: Earthworks - permitted activity.</p>	<p>Support</p>	<p>Allow submission and make the changes sought.</p>	<p>Consider it appropriate to carry over existing exemptions for minor earthworks such as those required for the laying, maintenance, upgrade and replacement of underground infrastructure and repair of existing paved areas. Rule WH.R23 as notified will result in consent requirements and associated costs for significant numbers of earthworks activities and is not reflective of the level of potential contaminates generated by small-scale earthworks undertaken with best practice erosion and sediment control measures in place.</p>



S177 Transpower New Zealand Limited	S177.067	Rule P.R22: Earthworks - permitted activity.	Support	Allow submission and make the changes sought.	Support the relief sought as an effective way of resolving the conflict between clause (g) and the 'minor discharges' rule R91.
S177 Transpower New Zealand Limited	S177.068	Rule P.R23: Earthworks - restricted discretionary activity	Support	Allow submission and make the changes sought.	Support the relief sought as consequential to the changes sought by S177 to Rule P.R22, which are supported, subject to the relief sought in relation to P.R23 in the Fuel Companies own submission.
S177 Transpower New Zealand Limited	S177.069	Rule P.R24: Earthworks - non-complying activity.	Support	Allow submission and make the changes sought.	Consider a discretionary, rather than non- complying, activity status is appropriate in the event the standards in P.R23 cannot be met, and there is insufficient evidence to justify a non-complying status.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.068	Schedule 28: Stormwater Contaminant Treatment.	Support	Allow submission.	Could support additional focus on management of suspended solids as an alternative way of achieving copper and zinc reductions where target load reductions are unrealistic.
S248 Ara Poutama Aotearoa the Department of Corrections	S248.069	Schedule 29: Stormwater Impact Assessments.	Support	Allow submission and make the changes sought.	Support changes as consistent with the relief sought by S248 to the stormwater rules, and which is supported by the further submissions of the Fuel Companies.



Form 6

Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

*Clause 8 of Schedule 1, Resource Management Act 1991*

To: Greater Wellington Regional Council (by email: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz))

Name of person making further submission: Cannon Point Development Limited (Ltd.)

This is a further submission in support of, and in opposition to, submissions on the change proposed to the following plan (the proposal):

- *Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region*

I am a person who has an interest in the proposal that is greater than the interest the general public has because:

- I am affected by the content of a submission.

I support, or oppose, the submission of:

- Refer to further submission attached.

The particular parts of the submission I support, or oppose, are:

- Refer to further submission attached.

The reasons for my support, or opposition, are:

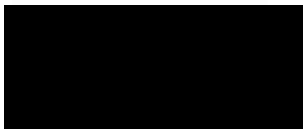
- Refer to further submission attached.

I seek that the whole, or part, of the submission be allowed, or disallowed:

- Refer to further submission attached.

I wish to be heard in support of my further submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.



.....  
Signature of person authorised to sign on behalf of person making further submission.

.....  
Date 8 March 2024

Electronic address for service of person making further submission: [michael.hall@awa.kiwi](mailto:michael.hall@awa.kiwi)

Telephone:

**Postal address:** Awa Environmental Limited, Level 1/ 1 Ghuznee Street, Te Aro, Wellington 6011  
**Contact person:** Michael Hall, Urban Spaces Lead

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b>	<b>Reasons:</b>
					<p><i>Illustrate which aspects of this original submission that you support or oppose.</i></p> <p><i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
S225 Upper Hutt City Council	S225.014	General comments - urban development	Support in part	Allow in part	Support the decision requested to delete provisions prohibiting urban expansion beyond existing urban zoned land.	Supported as it generally aligns with the relief sought by Cannon Point Development Ltd. in its original submission.
S225 Upper Hutt City Council	S225.020	General comments - stormwater management	Support	Allow	Support the decision requested to delete or significantly amend the addition of financial contributions with respect to stormwater discharges.	Supported as agree with submitter that there is a lack of justification and understanding of monitoring of these projects.
S206 Winstone Aggregates	S206.020	General comments - stormwater management	Support	Allow	Support the decision sought to provide for other forms of aquatic offsetting and aquatic compensation is enabled where aquatic offsetting cannot be achieved. Retain financial contribution offsetting as optional.	Supported as agree with submitter that the financial contribution provisions are inconsistent with the NPS:FM and limits the ability to implement the effects management hierarchy.
S30 Dean Spicer	S30.005	Interpretation: Unplanned	Support	Allow	Support: <ul style="list-style-type: none"> <li>• decision requested to remove the prohibited</li> </ul>	Supported as it aligns with the relief sought by Cannon Point



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		greenfield development			<p>activity status and allow applications for new unplanned greenfield developments.</p> <ul style="list-style-type: none"> <li>reasoning that GWRC should consider greenfield development individually based on impacts and proposed mitigants.</li> <li>amendment of prohibited activity status to reflect the outcome of UHCC Plan Change 50.</li> </ul>	Development Ltd. in its original submission.
S194 Urban Edge Planning Group on behalf of Mangaroa Farms Ltd	S194.003	Interpretation: Unplanned greenfield development	Support in Part	Allow in part	Support that part of the submission that seeks that the definition of unplanned greenfield development does not relate to the Rural Lifestyle zone and related prohibited activity framework.	Support this part of the submission as it reflects Cannon Point Development Ltd.'s original submission that the inclusion of the Rural Lifestyle Zone as Unplanned Greenfield Area is inconsistent with the inclusion of other similar zones as planned development across other local authorities. However, the submission is only supported in

Submitter number and name	Submission point number	Provision	Stance on the submission point	Decision Sought	Decision Sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons:  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
						part because this alone does not address the full scope of relief sought by Cannon Point Development Ltd.
S210 Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate	S210.012	Interpretation: Unplanned greenfield development	Support	Allow	Support decision requested to delete the definition. Agree that the ' Note' that includes reference to 30th October 2023 is inflexible and unnecessary and does not account for councils (such as UHCC) that may have a plan change going through the process that intends to rezone land to residential beyond that date, or for future plan changes, including the IPI UHCC plan change.	Supported as it aligns with the relief sought by Cannon Point Development Ltd. in its original submission.
S217 R P Mansell; A J Mansell, & M R Mansell	S217.003	Interpretation: Unplanned greenfield development	Support	Allow	Support decision sought that all greenfield development should be considered on its merits.  Agree with reasoning that the dual plan change process required under PC1, to change greenfield development from	Supported as it aligns with the relief sought by Cannon Point Development Ltd. in its original submission.

Submitter number and name	Submission point number	Provision	Stance on the submission point	Decision Sought	Decision Sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons:  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
					<p>unplanned to planned, should not be used as an alternative to the resource consenting process.</p> <p>Agree that the prohibition of activities is contrary to the NPS-UD.</p> <p>Agree that insufficient evidence is provided in the s32 report.</p>	
S225 Upper Hutt City Council	S225.048	Interpretation: Unplanned greenfield development	Support in part	Allow in Part	<p>Agree with submitter that Map 88 does not accurately reflect UHCC proposed Plan Change 50 notified on 4 October 2023.</p> <p>Agree that application of this provision from date of notification would circumvent ongoing planning process and prevent rezoning submissions on active plan changes.</p> <p>Agree in part with request to amend the definition to relate to the corrected map provided by</p>	Support in part because these aspects of the submission only partly provide for the development of the Cannon Point site.

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					the submitter, insofar as it reflects the proposed General Residential Zoning of part of the Cannon Point Site under UHCC Plan Change 50. However, additional areas are sought to also be included, as provided for in Appendix A and Paragraph 1.12 of Cannon Point’s submission.	
S238 Greater Wellington Regional Council	S238.009	Interpretation: Unplanned greenfield development	Oppose	Disallow	The retention of the notification date of 30 October 2023 as it applies to this definition is opposed. The introduction of the urban zone, future urban zone or settlement zone does not address submitter concerns regarding the exclusion of the Rural Lifestyle Zone from planned development.	This submission is opposed as the amendments do not address the concerns raised by Cannon Point Development Ltd. regarding the application of the provision from the date of notification and the inclusion of the Cannon Point Site as an unplanned greenfield area on Map 88.
S33 Wellington City Council	S33.035	Policy WH.P2 Management of activities to achieve target attribute states and	Support	Allow	Support the submitter’s concerns regarding the prohibitive provisions framework.	The submission is supported as it reflects the relief sought and reasons set out in Cannon Point Development Ltd.’s submission on this provision.

Submitter number and name	Submission point number	Provision	Stance on the submission point	Decision Sought	Decision Sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons:  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
		coastal water objectives			<p>Agree that the prohibited activity status is not demonstrated through the s32 report as the most appropriate option to achieve the objectives of the plan, and that a Discretionary Activity status is more appropriate.</p> <p>Agree that the District Plan is the most appropriate tool to manage urban development as set out in s3.5(4) of the NPS-FM 2020.</p>	
S38 Summerset Group Holdings Limited	S38.005	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Allow	Support the amendment sought to encourage greenfield development to minimise contaminants, rather than prohibiting greenfield development. Agree that the activity status will provide no consenting pathway for proposals located in these areas that may have positive/better outcomes for the	The submission is supported as it reflects the relief sought and reasons provided in Cannon Point Development Ltd.'s submission. It also raises valid concerns regarding the impact on housing supply which are shared by Cannon Point Development Ltd.

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					<p>community, freshwater and intensive rural activities.</p> <p>Agree that the dual plan change process required will make it difficult for the market to be responsive to providing housing, be expensive and impact the economic viability of development. Share the submitters concern that these impacts on housing supply have not been sufficiently assessed in the Section 32 Evaluation</p>	
S210 Guildford Timber Company Limited, Silverstream Forest Limited	S210.025	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Allow	Support the request to amend clause (a) to encourage unplanned and other greenfield development to minimise contaminants, rather than prohibiting unplanned greenfield development.	The proposed change to Clause (a) reflects the relief sought in Cannon Point Development Ltd.'s submission on this provision.

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
and the Goodwin Estate Trust.						
S225 Upper Hutt City Council	S225.067	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Allow	Support the request to amend Clause (a) to manage unplanned greenfield development rather than prohibiting it.  Agree with, and support, all reasons for relief sought, including: <ul style="list-style-type: none"> <li>• opposition to prohibition of development, as it limits options to give effect to NPS-UD and overrides District Plan changes and reviews currently underway or proposed in future.</li> <li>• greenfield development has more opportunity to address effects, particularly given space</li> </ul>	The proposed change to Clause (a) reflects the relief sought in Cannon Point Development Ltd.'s submission on this provision and supporting reasons. The submission also raises valid points regarding the opportunities for greenfield development to address adverse effects and the practical curtailing of future plan changes.

Submitter number and name	Submission point number	Provision	Stance on the submission point	Decision Sought	Decision Sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons:  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
					<p>available to incorporate design and infrastructure solutions when compared to constrained urban environments.</p> <ul style="list-style-type: none"> <li>prohibition in policy, and direction in objective above it, would render a future plan change an impossibility as it wouldn't implement higher order documents. Considers the section 32 analysis would need to consider provisions PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans.</li> </ul>	
S161 GILLIES	S161.013	Policy WH.P15:	Support in Part	Allow in part	Support deletion of reference to financial contributions.	Support amendment to the policy to provide that financial



<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
GROUP MANAGEMENT LTD		Stormwater contaminant offsetting for new greenfield development.				contributions are used in an appropriate way.
S165 PUKERUA HOLDINGS LIMITED	S165.013	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Support in Part	Allow in part	Support deletion of reference to financial contributions.	Support amendment to the policy to provide that financial contributions are used in an appropriate way.
S169 KORU HOMES NZ LIMITED	S169.008	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Support in Part	Allow in part	Support deletion of reference to financial contributions.	Supports amendment to the policy to provide that financial contributions are used in an appropriate way.
S173 ARAKURA	S173.013	Policy WH.P15:	Support in Part	Allow in part	Support deletion of reference to financial contributions.	Support amendment to the policy to provide that financial

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PLAINS DEVELOPMENT LIMITED		Stormwater contaminant offsetting for new greenfield development.				contributions are used in an appropriate way.
S177 Transpower New Zealand Limited	S177.023	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Support	Allow	Support proposed amendment to be consistent with the National Policy Statement: Freshwater Management. Agree that financial contributions should not be a mandatory means of aquatic offsetting and that resource consent applicants should have an opportunity to provide for other means of compensation/offsetting as part of proposals.	Support amendments to the policy to provide that financial contributions are used in an appropriate way.
S206 Winstone Aggregates	S206.042	Policy WH.P15: Stormwater contaminant offsetting for	Support	Allow	Support proposed amendment to be consistent with the National Policy Statement: Freshwater Management. Agree that financial contributions should not be a mandatory means of aquatic	Support amendments to the policy to provide that financial contributions are used in an appropriate way.

Submitter number and name	Submission point number	Provision	Stance on the submission point	Decision Sought	Decision Sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons:  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
		new greenfield development.			offsetting and that resource consent applicants should have an opportunity to provide for other means of compensation/offsetting as part of proposals.	
S33 Wellington City Council	S33.048	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Support	Allow	Agree with relief sought by submitter to allow for discretionary status (as this would be more consistent with objectives and effects management approach sought by Cannon Point Development Ltd.) or to delete policy. Agree with reasons regarding prohibitive provisions framework that is not demonstrated to be most appropriate option in section 32 report and application of case law.	The submission is supported as it aligns with the relief sought by Cannon Point Development Ltd.

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38 Summerset Group Holdings Limited	S38.009	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Support in part	Allow	Support relief sought to delete policy. Support reasons provided that oppose the prohibited approach to greenfield development.	Agree with the relief sought and supporting reasons as they generally align with Cannon Point Development Ltd.'s submission. Support in part because should the Policy not be deleted in the first instance as sought; Cannon Point Development Ltd. seeks to amend the policy to reflect an effects-management approach.
S161 GILLIES GROUP MANAGEMENT LTD	S161.014	Policy WH.P16: Stormwater discharges from new unplanned greenfield development	Support in part	Allow	Agree with relief sought to delete policy. Agree with opposition to prohibited approach to greenfield development. Agree that this does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater.	Agree with relief sought and supporting reasons as they generally align with Cannon Point Development Ltd.'s submission. Support in part because should the Policy not be deleted in the first instance as sought, Cannon Point Development Ltd. seeks to amend the policy to reflect an effects-management approach.
S165 PUKERUA	S165.014	Policy WH.P16:	Support in part	Allow	Agree with relief sought to delete policy. Agree with opposition to	Agree with relief sought and supporting reasons as they

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
HOLDINGS LIMITED		Stormwater discharges from new unplanned greenfield development			prohibited approach to greenfield development. Agree that this does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater.	generally align with Cannon Point Development Ltd.'s submission. Support in part because should the Policy not be deleted in the first instance as sought; Cannon Point Development Ltd. seeks to amend the policy to reflect an effects-management approach.
S169 KORU HOMES NZ LIMITED	S169.009	Policy WH.P16: Stormwater discharges from new unplanned greenfield development	Support in part	Allow	Agree with relief sought to delete policy. Agree with opposition to prohibited approach to greenfield development. Agree that this does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater.	Agree with relief sought and reasons as they generally align with Cannon Point Development Ltd.'s submission. Support in part because should the Policy not be deleted in the first instance as sought; Cannon Point Development Ltd. seeks to amend the policy to reflect an effects-management approach.
S173 ARAKURA PLAINS DEVELOPMENT	S173.014	Policy WH.P16: Stormwater discharges from new	Support in Part	Allow	Agree with relief sought to delete policy. Agree with opposition to prohibited approach to greenfield development. Agree that this does not provide a consenting	Agree with relief sought and reasons as they generally align with Cannon Point Development Ltd.'s submission. Support in part because should the Policy not be deleted in

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
LIMITED		unplanned greenfield development			pathway to consider a proposal that may have positive outcomes for the community or for freshwater.	the first instance as sought; Cannon Point Development Ltd. seeks to amend the policy to reflect an effects-management approach.
S210 Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	S210.032	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Support	Allow	<p>Agree with relief sought to delete policy or amend policy to provide a more flexible effects management approach consistent with the objectives and other policies in PC1.</p> <p>Agree with the submitters, who do not consider that the implementation of the PC1 objectives requires or justifies the avoidance as the only option for managing stormwater discharges from unplanned greenfield development, and the subsequent prohibited activity rule approach.</p>	Agree with relief sought and reasons as they generally align with Cannon Point Development Ltd.'s submission.

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
S161 GILLIES GROUP MANAGEMENT LTD	S161.015	Policy WH.P31: Winter shut down of earthworks.	Support	Allow	Support the relief sought to delete this policy.  Support all the submitter's reasoning.	Agree with relief sought and supporting reasons as they generally align with Cannon Point Development Ltd.'s submission.
S165 PUKERUA HOLDINGS LIMITED	S165.015	Policy WH.P31: Winter shut down of earthworks.	Support	Allow	Support the relief sought to delete this policy.  Support all the submitter's reasoning.	Agree with relief sought and supporting reasons as they generally align with Cannon Point Development Ltd.'s submission.
S210 Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	S210.037	Policy WH.P31: Winter shut down of earthworks.	Support	Allow	Support the relief sought to delete this policy.  Support all the submitter's reasoning.	Agree with relief sought and supporting reasons as they generally align with Cannon Point Development Ltd.'s submission.
S161 GILLIES GROUP	S161.021	Rule WH.R11: Stormwater from new and	Support in Part	Allow in Part	Supports request to delete clause (b) regarding the requirement for	Supports amendments to rule to provide that financial contributions are used in an appropriate way.

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
MANAGEMENT LTD		redeveloped impervious surfaces - discretionary activity.			financial contributions for greenfield development.	
S165 PUKERUA HOLDINGS LIMITED	S165.021	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support in Part	Allow in Part	Supports request to delete clause (b) regarding the requirement for financial contributions for greenfield development.	Supports amendments to rule to provide that financial contributions are used in an appropriate way.
S169 KORU HOMES NZ LIMITED	S169.016	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support in Part	Allow in Part	Supports request to delete clause (b) regarding the requirement for financial contributions for greenfield development.	Supports amendments to rule to provide that financial contributions are used in an appropriate way.
S173 ARAKURA PLAINS	S173.021	Rule WH.R11: Stormwater from new and	Support in Part	Allow in Part	Supports request to delete clause (b) regarding the requirement for	Supports amendments to rule to provide that financial contributions are used in an appropriate way.



<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
DEVELOPMENT LIMITED		redeveloped impervious surfaces - discretionary activity			financial contributions for greenfield development.	
S177 Transpower New Zealand Limited	S177.035	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support in Part	Allow in Part	Supports request to delete clause (b) regarding the requirement for financial contributions for greenfield development.	Supports amendments to rule to provide that financial contributions are used in an appropriate way.
S206 Winstone Aggregates	S206.053	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support in Part	Allow in Part	Supports request to delete clause (b) regarding the requirement for financial contributions for greenfield development.	Supports amendments to rule to provide that financial contributions are used in an appropriate way.
S210 Guildford Timber	S210.044	Rule WH.R13: Stormwater from new	Support	Allow	Support the relief sought to delete this rule and introduce a non-complying activity rule for	Agree with relief sought and supporting reasons as they

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.		unplanned greenfield development - prohibited activity			activities that cannot comply with one or more conditions or standards in proposed rules.  Support and agree with all submitters supporting reasons.	generally align with Cannon Point Development Ltd.'s submission.
S161 GILLIES GROUP MANAGEMENT LTD	S161.023	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity	Support in part	Allow	Support the relief sought to delete this rule and supporting reasons.	Cannon Point Development Ltd. supports the relief sought. However, in addition, it also seeks that stormwater from new unplanned greenfield development is managed under Rule WH.R11 as a discretionary activity or Rule WH.R12 as a non-complying activity.
S165 PUKERUA HOLDINGS LIMITED	S165.023	Rule WH.R13: Stormwater from new unplanned greenfield development -	Support in Part	Allow	Support the relief sought to delete this rule and supporting reasons.	Cannon Point Development Ltd. supports the relief sought. However, in addition, it also seeks that stormwater from new unplanned greenfield development is managed under Rule WH.R11 as a

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
		prohibited activity.				discretionary activity or Rule WH.R12 as a non-complying activity.
S211 Hutt City Council	S211.022	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity	Support	Allow	Support relief sought. Strongly agree with all supporting reasons, including that the prohibited activity status precludes consenting pathways for development in unplanned greenfield areas that may have positive outcomes, as highlighted in Cannon Point Development Ltd.'s submission.	Agree with relief sought and supporting reasons as they generally align with Cannon Point Development Ltd.'s submission.
S225 Upper Hutt City Council	S225.104	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity	Support	Allow	Support relief sought to delete rule or amend significantly to change from prohibited and provide a consenting pathway for unplanned greenfield developments.  Support reasons. In particular, concerns regarding the implications and practicality of	Agree with relief sought as it generally reflects that sought in Cannon Point Development Ltd.'s submission. Strongly agree with supporting reasons with respect to the implications for current and future plan changes.

Submitter number and name	Submission point number	Provision	Stance on the submission point	Decision Sought	Decision Sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons:  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
					<p>this rule and that prohibition in policy, and the direction in objective above it, would effectively render a future plan change an impossibility because it would not be implementing higher order documents.</p> <p>Section 32 analysis for such a plan change would need to consider provisions in PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans.</p>	
S238 Greater Wellington Regional Council	S238.018	Rule WH.R23: Earthworks - permitted activity.	Support	Allow	Supports the proposed amendment to provide that Rule WH.R23 should apply to all Earthworks.	Support as it provides for the relief sought by Cannon Point Development Ltd.
S261 Forest & Bird	S261.116	Rule WH.R23: Earthworks - permitted activity	Oppose	Disallow	Opposed as it is considered that the 5m setback, as proposed, is sufficient to protect ecosystems and maintain water quality.	Opposed as it is considered the 5m setback as notified is appropriate.

Submitter number and name	Submission point number	Provision	Stance on the submission point	Decision Sought	Decision Sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons:  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
S161 GILLIES GROUP MANAGEMENT LTD	S161.025	Rule WH.R24: Earthworks - Restricted discretionary activity	Support in part	Allow in part	Support relief sought to delete clause (b). Support all reasons in relation to this and impacts on the provision of housing supply.	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of matter of discretion (8) and considers deletion of both parts are required to adequately address its concerns.
S165 PUKERUA HOLDINGS LIMITED	S165.025	Rule WH.R24: Earthworks - Restricted discretionary activity	Support in part	Allow in part	Support relief sought to delete clause (b). Support all reasons in relation to this and impacts on the provision of housing supply.	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of matter of discretion (8) and considers deletion of both parts are required to adequately address its concerns.
S169 KORU HOMES NZ LIMITED	S169.020	Rule WH.R24: Earthworks - restricted discretionary activity	Support in part	Allow in part	Support relief sought to delete clause (b). Support all reasons in relation to this.	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of matter of discretion (8) and considers deletion of both parts are

Submitter number and name	Submission point number	Provision	Stance on the submission point	Decision Sought	Decision Sought <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons:  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
						required to adequately address its concerns.
S173 ARAKURA PLAINS DEVELOPMENT LTD	S173.025	Rule WH.R24: Earthworks - restricted discretionary activity	Support in part	Allow in part	Support relief sought to delete clause (b). Support all reasons in relation to this and impacts on the provision of housing supply.	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of matter of discretion (8) and considers deletion of both parts are required to adequately address its concerns.
S211 Hutt City Council	S211.024	Rule WH.R24: Earthworks - restricted discretionary activity	Support in part	Allow in part	Support the relief sought to delete clause (b).  Support reasoning that the BAU approach for winter earthworks should be maintained as a standard condition of consent as a discretionary activity which would allow GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	Support in part because whilst Cannon Point Development Ltd.'s submission seeks deletion of clause (b), it also seeks the deletion of matter of discretion (8) and considers deletion of both parts are required to adequately address its concerns.

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
S225 Upper Hutt City Council	S225.126	Map 88: Unplanned greenfield areas - Upper Hutt City Council	Support in part	Allow in part	<p>Supports the submitters stance that Map 88 as does not accurately reflect Council plan change 50 notified on 4 October 2023.</p> <p>Agree that application of this provision from date of notification would circumvent ongoing planning process and prevent rezoning submissions on active plan changes.</p> <p>Agree in part with request to amend the definition to relate to the corrected map provided by the submitter, insofar as it reflects the proposed General Residential Zoning of part of the Cannon Point Site under UHCC Plan Change 50. However, additional areas are sought to also be included, as provided for in</p>	Support in part because the relief sought will only provide for part of the Cannon Point site to be zoned as planned development, rather than the extent as sought in Appendix A and Paragraph 1.12 of Cannon Point Development Ltd.'s submission.

<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
					Appendix A and Paragraph 1.12 of Cannon Point's submission.	
S38 Summerset Group Holdings Limited	S38.037	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Support in part	Allow	Support the relief sought by the submitter to delete Map 88.  Support all reasons provided.	Support in part because whilst Cannon Point Development Ltd seeks that, in the first instance, Map 88 is deleted, if this is not accepted, it seeks for the Map to be amended as provided for in its submission.
S161 GILLIES GROUP MANAGEMENT LTD	S161.044	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Support in part	Allow	Support the relief sought by the submitter to delete Map 88.  Support all reasons provided.	Support in part because whilst Cannon Point Development Ltd. seeks that. in the first instance. Map 88 is deleted, if this is not accepted, it seeks for the Map to be amended as provided for in its submission.
S169 KORU HOMES NZ LIMITED	S169.039	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Support in part	Allow	Support the relief sought by the submitter to delete Map 88.  Support all reasons provided.	Support in part because whilst Cannon Point Development Ltd. seeks that. in the first instance. Map 88 is deleted, if this is not accepted, it seeks for the Map to be amended as provided for in its submission.
S173 ARAKURA PLAINS	S173.044	Map 88: Unplanned greenfield	Support in part	Allow	Support the relief sought by the submitter to delete Map 88.	Support in part because whilst Cannon Point Development Ltd. seeks that, in the first instance, Map



<b>Submitter number and name</b>	<b>Submission point number</b>	<b>Provision</b>	<b>Stance on the submission point</b>	<b>Decision Sought</b>	<b>Decision Sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
DEVELOPMENT LIMITED		areas - Upper Hutt City Council.			Support all reasons provided.	88 is deleted, if this is not accepted, it seeks for the Map to be amended as provided for in its submission.
S194 Urban Edge Planning Group on behalf of Mangaroa Farms Ltd	S194.023	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Support in Part	Allow in part	Support relief sought to provide that the areas identified in Map 88 relating to unplanned greenfield development do not relate to development occurring in the Rural Lifestyle Zone.  Do not support the submitter's neutral stance.	The submission is supported in part only because the stance of the submitter differs. The scope of the submission only covers part of that area that Cannon Point Development Ltd. seeks to be excluded from Map 88 (in the instance it is not deleted).

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:


- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.

Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
<b>Name of Submitter:</b> (First and last name, or organisation / company)	CentrePort Limited
<b>Address for service:</b> (Email, or physical address) Please note an <u>email address</u> is the preferred method	PO Box 794 Wellington 6140
<b>Phone:</b> (Optional)	██████████
<b>Contact person for submission:</b> (If different to above)	William Woods
<b>I wish to be heard in support of my submission at a hearing:</b>	Yes
<b>I would consider presenting a joint case at the hearing with others who make a similar submission:</b>	Yes

2. Criteria applicable to Further Submitter:	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	
Specify the reasoning behind why you qualify for either of these above options:	CentrePort owns and operates the port and is affected by PC1.

3. For the further submitter to action
<p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

4. Disclosures:	
<p>If submitting on behalf of a company / organisation:</p> <p>I confirm that I have permission to provide this information on behalf of the company / organisation</p>	 8 March 2024
<p><b>Public information:</b></p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.</p> <p>You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>	

5. Further Submission:
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested:             <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format:             <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul> </li> </ul>


Please enter further submission points in the table on the following page(s)

<b>4. Further submission points</b>					
<b>*Submitter name</b>	<b>*Submission point number:</b>	<b>*Stance on the submission point:</b>	<b>*Decision sought:</b>	<b>Decision sought</b>	<b>Reasons:</b>
Forest & Bird	S261.051	Oppose	Disallow	Whole submission point	CentrePort supports the maintenance and improvement of coastal water quality to ensure the objectives set out in Table 8.1 are met but considers that the timeframe should be to 2040 rather than 2030 as suggested by Forest & Bird. This is to recognise the investment needed in some circumstances to ensure these parameters are maintained or improved.
Forest & Bird	S261.052	Oppose	Disallow	Whole submission point	CentrePort does not support the inclusion of turbidity in the coastal water objectives. Objective WH.O3 indirectly supports ensuring turbidity is at acceptable levels by 2040 so that coastal areas support healthy functioning ecosystems.
Forest & Bird	S261.071	Oppose	Disallow	Whole submission point	CentrePort does not support the inclusion of 'toxics' into this policy. Copper and zinc are recognised as two key contaminants associated with stormwater discharges and it is considered that the scope of this does not need to be amended to include other contaminants.
Forest & Bird	S261.101	Oppose	Disallow	Whole submission point	CentrePort does not support reclassifying this as a discretionary activity rule and consider that restricted discretionary is an appropriate activity status.
Forest & Bird	S261.102	Oppose	Disallow	Whole submission point	CentrePort does not support the inclusion of a new matter of discretion stating ' <i>adverse effects on the environment</i> '. CentrePort consider that the matters of discretion in Rule WH.R8 adequately address the adverse effects on the environment.
Environmental Defence Society (EDS)	S222.024	Oppose	Disallow	Whole submission point	CentrePort supports the maintenance and improvement of coastal water quality to ensure the objectives set out in Table 8.1 are met. However, CentrePort consider that the timeframe should be to 2040 rather than 2030 as suggested by EDS. This is

					to recognise the investment needed in some circumstances to ensure these parameters are maintained or improved.
Environmental Defence Society (EDS)	S222.025	Oppose	Disallow	Whole submission point	CentrePort does not support the inclusion of turbidity in the coastal water objectives. Objective WH.O3 indirectly supports ensuring turbidity is at acceptable levels by 2040 so that coastal areas support healthy functioning ecosystems.
Department of Conservation	S245.047	Oppose	Disallow	Whole submission point	This submission seeks that Rule WH.R8 is amended as appropriate to better give effect on NZCPS Policy 23(4) matters a) to d). CentrePort considers Rule WH.R8 has been drafted to give effect to these matters. As such, do not support the relief support in this submission point.

Please enter your details below:

**1. Details of further submitter:**

<b>* Submitter Name:</b> Full name, or Name of Organisation / Company	Construction Contracts Ltd
<b>Contact person for submission:</b> (If different to above)	David Howard
<b>Telephone no:</b> (Not required)	
<b>* Address for service:</b> (Email, or physical address) Please note, an <u>email address</u> is the preferred method	<a href="mailto:david@ccl.co.nz">david@ccl.co.nz</a>
<b>* I wish to be heard in support of my submission at a hearing</b>	No
<b>* I would consider presenting a joint case at the hearing with others who make a similar submission</b>	Yes


**2. Criteria applicable to Further Submitter:**

<b>* Only certain people may make further submissions Please select the option that applies to you:</b>	
<b>A) I am a person representing a relevant aspect of the public interest; or</b>	Yes
<b>B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or</b>	Yes
<b>C) I am the local authority for the relevant area.</b>	No
<b>* Specify the reasoning behind why you qualify for either of these above options:</b>	I am making this further submission under criteria A because the ability to conduct earthworks for transport and water construction is of great public benefit, and therefore in the public interest. I am also making this further submission under criteria B, because I work in a civil construction business that will be directly impacted by the changes.

**3. For the further submitter to action**

<p>Service of your further submission: Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</p> <p>Each submitter has an address for service available at: <a href="#">NRP PC1 Address for Service</a></p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>
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**4. Disclosures:**

<p>If providing a submission on behalf of a company / organisation I confirm that I have authority to do so:</p>	
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Date:

6/03/2024

Public information:

Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.

In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the below:

[Plan Change 1 to the Natural Resources Plan Information Statement.](#)

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at [privacy@gw.govt.nz](mailto:privacy@gw.govt.nz).

#### 5. Further Submission:

- The original submissions received have been summarised into submission points and collated into one summary table.

This document(s) is a Summary of Decisions Requested:

[NRP PC 1 - Summary of Decisions Requested – By Submitter](#)

[NRP PC 1 - Summary of Decisions Requested –By Provision](#)

- Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.
- If you are providing suggested text amendments to a provision, please do so in the following format:

- Suggested added text, shown as **bolded text** format

- Suggested deleted text, shown as ~~strikethrough~~ format

Please enter your Further Submission in the next worksheet. All of the original submitters and their associated submission points on the proposed change have been included so please place your comments in the corresponding cells.

If you have questions on how to use this submission form please email one of our friendly team at [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)



Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Filter original submission point by the chapter location	Filter original submission point by specific provision title	Filter by the original submitter Name and associated Submitter Number	Unique identifying number allocated to each specific submission point	Support Oppose Support in part Oppose in part Not stated	Allow Disallow Allow in part Disallow in part	<p>Illustrate which aspects of this original submission that you support or oppose.</p> <p>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</p>	Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
General comments	<b>Earthworks</b>	S285 - Civil Contractors New Zealand	S285.003	Support	Allow	GWRC to take more responsibility for planning and consenting appropriate cleanfill site locations across the region, especially if this material must be disposed of at an official cleanfill site. The wording 'to a cleanfill site' should be removed in the short term, as there are very few available sites.	The region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill, and this is escalating project costs. If this single remaining site fills up, shipping cleanfill out of the region will greatly escalate cost and reduce project efficiency.
Chapter 2	<b>Earthworks</b>	S285 - Civil Contractors New Zealand	S285.006	Support	Allow	<p>Reinstate the previous definition of earthworks.</p> <p>Remove 'to a cleanfill area' from the point in definition for 'all other whatua'.</p>	<p>Changing the definition of earthworks will require considerable resource from industry to understand and implement. The existing definition of earthworks is well understood, and the complication arising from a new definition for Whatua Te Whanganui-a-Tara and Te Awarua-o-Porirua is not needed.</p> <p>The addition of 'to a cleanfill area' to 2.2 (i) is problematic as there are significant constraints around sites in the region at the moment and the availability of cleanfill sites needs to be taken into account. If it is not, this will hamper the ability to deliver infrastructure projects</p> <p>The new definition proposed may also result in a significant rise in consent applications being required for minor pipe or road repairs, which is something that should be avoided as it will not add value and council is unlikely to be resourced to handle the required volume of consent applications in a timely way.</p>



Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Chapter 8	Table 8.4: Target attribute states for rivers.	S285 - Civil Contractors New Zealand	S285.018	Support	Allow	Delete specific reference to test methodologies from the plan and handle site testing based on the nature of the site and its location. Or, (minimum) make sure the test method used is industry appropriate, and not increasing cost without adding value.	Test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked (consider pumice vs iron sand) and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.
Chapter 8	Policy WH.P31: Winter shut down of earthworks.	S285 - Civil Contractors New Zealand	S285.019	Support	Allow	Delete policy WH.P31 If amended rather than deleted, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. Increasing hard shutdown of work sites over winter is not tenable for the region's civil construction industry.	This policy will be catastrophic for the region, and greatly reduce contractor capacity. A 'hard shutdown' over winter will render civil construction and earthmoving companies unable to retain staff (impossible to hold a job where you cannot work for four months of the year). In turn, this will increase project costs significantly. The plan change also does not take into account differences in material worked or terrain and that some winter works must be allowed via resource consents or some other avenue, if the site meets certain criteria. Notes some jobs (sand jobs) have much less sediment and runoff in rainfall and winter is actually a better time for these jobs to run, as there is less dust.
Chapter 8	Rule WH.R6: Stormwater from new greenfield impervious	S43 - Fulton Hogan Ltd	S43.015	Support	Allow		

Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
	surfaces – controlled activity.						
Chapter 8	Rule WH.R23: Earthworks – permitted activity.	S285 - Civil Contractors New Zealand	S285.024	Support in part	Allow	Amend Rule WH.R23 to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.	It is important rules of this nature are as simple and easy to apply as possible. Many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. We are concerned council would not have capacity to perform this work on a timely basis.
Chapter 8	Rule WH.R24: Earthworks – restricted discretionary activity.	S285 - Civil Contractors New Zealand	S285.025	Support	Allow	Amend policy WH.R24 (b) If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).	The shutdown of earthworks between 1 June and 30 September is inappropriate as works can be managed during this period with no adverse effects. Test methodologies should add value rather than just adding complexity and cost, and be appropriate to how monitoring occurs on site. The industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids (inappropriate as different materials have a different weight - i.e. iron sand vs pumice).
Chapter 8	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-	S285 - Civil Contractors New Zealand	S285.026	Support	Allow	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take	This policy needs to better reflect the realities around water use in projects and work sites, or it could inflict significant delay on works and hamper ability of contractors and emergency services to respond.

Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
	a Tara – restricted discretionary activity.						
Chapter 9	Policy P.P28: Discharge standard for earthworks sites.	S285 - Civil Contractors New Zealand	S285.030	Support	Allow	Strongly amend to remove prevention of winter work permits, amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.
Chapter 9	Policy P.P29: Winter shut down of earthworks.	S285 - Civil Contractors New Zealand	S285.031	Support	Allow	Amend policy P.P29 (a) to ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled	A hard shutdown of earthworks between 1 June and 30 September is inappropriate as many works may be able to be managed during this period with no adverse effects. A hard shutdown should be avoided where possible, as this creates the situation where companies cannot retain staff, and the region will lose capability and capacity, as well as facing much higher costs and extended project timeframes due to staffing shortages and severely restricted ability to carry out works.
Chapter 9	Rule P.R22: Earthworks – permitted activity.	S285 - Civil Contractors New Zealand	S285.032	Support in part	Allow in part	Amend the definition of earthworks that governs Rule P.R22, to reinstate the exemptions for certain earthworks activities	Many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits but would be unable to meet the permitted

Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
						as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.	activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Does council have capacity to consent this additional workload on a timely basis?
Chapter 9	Rule P.R23: Earthworks – restricted discretionary activity.	S285 - Civil Contractors New Zealand	S285.033	Support	Allow	Amend policy P.R23 (b), which proposes inappropriate and excessive shutdown of earthworks over winter. Ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either leave this to implementation guidance specify which sort of test is used , or refer to the correct on-site test method (NTU)	The shutdown of earthworks between 1 June and 30 September is inappropriate as works may be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.



6<sup>th</sup> March 2024

Dear Greater Wellington Regional Council,

I am writing in support of the submission made by Civil Contractors New Zealand on your proposed Natural Resources Proposed Plan Change 1.

I request that you consider the feedback made in the submission, and the impact proposed changes may have on the local civil construction industry, and the region's ability to carry out infrastructure projects. Specifically, and with priority I request that you:

- Do not proceed with your proposal to implement different definitions of earthworks in different part of the region. This will only result in added cost and confusion. Please retain the existing definition of earthworks.
- Delete policy WH.P30: Discharge standard for earthworks. The proposed test methodology is not fit for purpose, and this should instead be handled in consent conditions depending on the nature of the site where the earthworks are taking place.

If the policy is to remain, the test methodology should be handled in guidance depending on the site and its surroundings, not as a blanket rule in the Natural Resources Plan itself.

- Delete policy WH.R23, which is written in a way that may require resource consent for basic works and emergency maintenance of transport and water networks, and in turn may overload council consenting capacity. If you do not delete this, please remove the reference to a hard shutdown of earthworks over winter and allow appropriate exceptions to this.
- Delete policy P.R24 (which treats earthworks as a non-complying activity, and should instead treat it as a restricted discretionary activity).
- Delete policy WH.P31 and P.P29, which dictate hard shutdowns of earthworks sites for four months of the year. This policy will be disastrous for the regional industry, as it will prevent companies from retain earthmoving staff over those months. In turn, this will greatly escalate project cost and the ability for projects to proceed across the region. And if it is applied to sites that are already well-managed, it will create cost and disruption while adding no value. This approach must be reconsidered.
- Consider in P.R31, P.R32, P.R33 water usage for emergency works and essential environmental controls – i.e. dust control.

I also support the rest of the points made in the Civil Contractors New Zealand submission, and ask you to consider the impacts this plan change will have on horizontal construction across the region, which will increase costs across the board, including housing, transport and water construction.

Overall, I feel direct consultation with the civil construction industry has been absent in the creation of this plan, and is required to make sure the Natural Resources Plan is fit for purpose. Accordingly, I request the plan change does not go ahead.

Sincerely,



**David Howard**  
**MANAGING DIRECTOR**



## Further Submitter Details

**Further Submitters Name** Diane Strugnell

**Further Submitter Number** FS12

## Further Submission Points

The table below displays all existing further submitter points linked to the further submitter above that are already in the database. To add another further submission point, use the form below the table.

FS Point Number	Original submitter	Related submission point	FS support oppose	Plan provision	Reasons	Decision requested	Decision sought	Notes	Status	Edit
No Data										

## Raw further submission points

This table shows raw further submission points that have been entered via an online submissions.

Raw FS number	Related Submission Point	SupportOppose	FS Decision requested	Decision sought	Reasons	Entered into Spoken?	Transfer directly
FS12.1	S193.008	Support	Allow	Amend policy to give effect to the relief sought	For the reasons set out by the submitter. Farming operations, including those to address the wellbeing of people and livestock as well as of the environment, should be able to be managed within existing rules and/or under a farm plan without the need for the added time and cost of a resource consent.	No	<a href="#">Transfer directly...</a>
FS12.2	S51.003	Support	Allow	Removal of the regulatory approach for PC1	As identified by the submitter. The benefits of working alongside landowners to incentivise best practice are likely to be far more effective than a regulatory approach. This was very much the emphasis from the Whaitua	No	<a href="#">Transfer directly...</a>

FS12.3	S51.004	Support	Allow	That a farm-scale and catchment-scale approach is adopted, rather than across a whaitua or Freshwater Management Unit.	A lot of the information used to inform policy and rules appears to be sourced from modelling and applied across a broader scale rather than at a farm or subcatchment scale. Enabling a farm or subcatchment scale to be used makes the actions required to address specific issues (e.g. sediment loss) more appropriate and likely to be more successful.	No	<a href="#">Transfer directly...</a>
FS12.4	S9.004	Support	Allow	Submission point as a whole	Agree that PC1 should provide catchment context to inform farm plans ensuring farms identify actual issues and solutions and avoid regulatory "by-catch" from broad rules.	No	<a href="#">Transfer directly...</a>
FS12.5	S261.010	Oppose	Disallow	The submission point as a whole	Farming is a permitted activity within both local and regional councils and the effect of removing this activity status and to require resource consents would have a significant (and detrimental) effect on the rural community. The rural community, within not just Porirua but the wider Wellington region, plays a significant role in protecting and promoting positive environmental outcomes and this should be incentivised not made more difficult by the introduction of consenting processes over	No	<a href="#">Transfer directly...</a>



and above those required for specific purposes e.g. significant earthworks

FS12.6	S176.008	Support	Allow	The whole submission point	The cost and resourcing to implement PC1 will be critical for the success of the Whaitua Implementation Programmes and for the desired environmental outcomes	No	<a href="#">Transfer directly...</a>
FS12.7	S261.011	Support in part	Allow in part	The inclusion of critical source areas as a source of sediment that requires management	The regulatory approach that has been taken is focused on the highest erosion risk land while not acknowledging that critical source areas can be significant sources of sediment that require management within farm plans	No	<a href="#">Transfer directly...</a>
FS12.8	S193.021	Support	Allow	The whole submission point	For the reasons identified by the submitter.	No	<a href="#">Transfer directly...</a>
FS12.9	S26.016	Support	Allow	As per submission	The winter months, as identified in PP29, are not necessarily those with highest rainfall events. High rainfall events in the summer months, following a dry period when they are often least expected, can result in much higher levels of sediment being washed off compared to during the winter months.	No	<a href="#">Transfer directly...</a>
FS12.10	S193.163	Support	Allow	Whole submission point	As per reason set out by submitter.	No	<a href="#">Transfer directly...</a>

## Add Further Submission Point

Related original Submitter \*

S1 ▼

Please enter your details below:

**1. Details of further submitter:**

<b>* Submitter Name:</b> Full name, or Name of Organisation / Company	Donald Keith Skerman
<b>Contact person for submission:</b> (If different to above)	
<b>Telephone no:</b> (Not required)	Optional
<b>* Address for service:</b> (Email, or physical address) Please note, an <u>email address</u> is the preferred method	<a href="mailto:donskerman@xtra.co.nz">donskerman@xtra.co.nz</a>
<b>* I wish to be heard in support of my submission at a hearing</b>	No
<b>* I would consider presenting a joint case at the hearing with others who make a similar submission</b>	No

**2. Criteria applicable to Further Submitter:**

<b>* Only certain people may make further submissions Please select the option that applies to you:</b>	
<b>A)</b> I am a person representing a relevant aspect of the public interest; or	Yes
<b>B)</b> I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
<b>C)</b> I am the local authority for the relevant area.	No
<b>* Specify the reasoning behind why you qualify for either of these above options:</b>	I made a previous submission on this plan change

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If providing a submission on behalf of a company / organisation <b>I confirm that I have authority to do so:</b>	Signature
<b>Date:</b>	Insert

Public information:

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- If you are providing suggested text amendments to a provision, please do so in the following format:

- Suggested added text, shown as **bolded text** format

- Suggested deleted text, shown as ~~striketrough~~ format

Please enter your Further Submission in the next worksheet. All of the original submitters and their associated submission points on the proposed change have been included so please place your comments in the corresponding cells.

If you have questions on how to use this submission form please email one of our friendly team at [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Filter original submission point by the chapter location	Filter original submission point by specific provision title	Filter by the original submitter Name and associated Submitter Number	Unique identifying number allocated to each specific submission point	Support Oppose Support in part Oppose in part Not stated	Allow Disallow Allow in part Disallow in part	<p>Illustrate which aspects of this original submission that you support or oppose.</p> <p>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</p>	Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
General comments	<b>Unplanned greenfield development</b>	S210 - Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	S210.001	Oppose	Disallow	Retain this land as 'unplanned greenfield areas'	<p>Any residential development on this land needs to be properly assessed. The Upper Hutt City Council website gives the following answer to a Frequently Asked Question regarding the Southern Growth Area "If the land is planned to be developed what is the processes that must be followed?" Answer "Any future residential development of GTC land and the Silverstream Spur for the construction of a road/infrastructure corridor would require either Council or GTC to initiate a Plan Change process under the Resource Management Act. The plan change process requires public consultation whereby the public would have an opportunity to submit and present their views at a hearing. It would be premature for the Council to consult with the public now on any plan change because Council and GTC have not yet initiated this work, and no formal proposal has been received."</p> <p>and to the question "Will a resource consent be required for any planned development on the Spur and GTC land and will that be open to public consultation?" Answer "If and when a Resource Consent application is lodged, the Council will follow the process mandated under the Resource Management Act, and under that process public notification must be formally considered and determined. "</p>

Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
							Ref <a href="https://www.upperhuttcity.com/Home/Tab/Your-Council/Plans-policies-bylaws-and-reports/Upper-Hutt-Southern-Growth-Area">https://www.upperhuttcity.com/Home/Tab/Your-Council/Plans-policies-bylaws-and-reports/Upper-Hutt-Southern-Growth-Area</a> (visited 25/2/2024)
General comments	<b>Unplanned greenfield development</b>	S210 - Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	S210.002	Oppose	Disallow	Retain requirements for 'unplanned greenfield areas' and 'unplanned greenfield development'	Management of storm water should be the responsibility of the developer
General comments	<b>Unplanned greenfield development</b>	S210 - Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust.	S210.005	Oppose	Disallow	Retain this land as 'unplanned greenfield areas'	Please refer to reasons given for opposing S210.001 as well as the following. This land is not close to public transport and would cause a significant increase in motor vehicle congestion around the Silverstream and Pinehaven areas. The Silverstream bridge is not the bottle-neck for traffic accessing Fergusson Drive to drive to employment, schools or shops. Parking around the railway station and Silverstream shops is already at capacity.
Chapter 8	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	S225 - Upper Hutt City Council	S225.099	Oppose	Disallow	Retain financial contributions	Developers of 'unplanned greenfield areas' should be responsible for these costs, not ratepayers

Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
General comments	General comments - water quality improvements	S282 - Pat van Berkel	S282.002	Support	Allow	Add a requirement in the NRP that water quality improvement (through pipe network repairs, etc) be staged and that the timeline be published and updated each year.	Repairs are needed to wastewater infrastructure and progress needs to be visible to the public
General comments	General comments - target attribute states	S282 - Pat van Berkel	S282.003	Support	Allow	Retain the TAS (Target Attribute State) for e-coli to reach high quality by 2040.	A more ambitious goal should be achievable
Chapter 8	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	S282 - Pat van Berkel	S282.010	Support	Allow	Quantify permitted levels of benthic cyanobacteria. Amend to include the risk to dogs.	"Low risk" needs to be quantified A lot of human users of the river bring their dogs with them.
Chapter 8	Table 8.3 Primary contact site objectives in rivers.	S282 - Pat van Berkel	S282.011	Support	Allow	Add a Parameter in Table 8.3, namely "Swimmable Days". Add a Parameter in Table 8.3 which is a measure of benthic cyanobacteria or cyanobacteria blooms. Specify improvements at all locations by 2040	The number of swimmable days would be a good easy to understand measure of improvement in water quality. Improvements in water quality should be achievable by 2040
Chapter 8	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara – restricted discretionary activity.	S282 - Pat van Berkel	S282.018	Support	Allow	Add to these rules the gradual changes in minimum flow that are required between 2021 (when the recommendation was accepted by Greater Wellington) and 2071	At present the minimum flow of Te Awa Kairangi is at 30% of MALF.
Chapter 8	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara – discretionary activity.	S282 - Pat van Berkel	S282.019	Support	Allow	Add to these rules the gradual changes in minimum flow that are required between 2021 (when the recommendation was accepted by Greater Wellington) and 2071	At present the minimum flow of Te Awa Kairangi is at 30% of MALF.

Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Chapter 13	Map 85: Primary contact sites – Te Whanganui-a-Tara.	S282 - Pat van Berkel	S282.020	Support	Allow	Add site "Whakatikei River at Hutt Confluence" to Map 85 (and to a text list of the definition of Primary contact sites.)	This is a popular swimming location
Chapter 13	Map 88: Unplanned greenfield areas – Upper Hutt City Council.	S282 - Pat van Berkel	S282.021	Support	Allow	Retain southern growth area as unplanned greenfield development	Refer to my reasons for opposing S210.001

## Further Submitter Details

**Further Submitters Name** Enviro NZ Services Ltd

**Further Submitter Number** FS10

## Further Submission Points

The table below displays all existing further submitter points linked to the further submitter above that are already in the database. To add an another further submission point, use the form below the table.

FS Point Number	Original submitter	Related submission point	FS support oppose	Plan provision	Reasons	Decision requested	Decision sought	Notes	Status	Edit
No Data										

## Raw further submission points

This table shows raw further submission points that have been entered via an online submissions.

Raw FS number	Related Submission Point	SupportOppose	FS Decision requested	Decision sought	Reasons	Entered into Spoken?	Transfer directly
FS10.1	S239.002	Support	Allow	The addition of a definition for greenfield development is supported	Without a definition the application of this terminology is ambiguous and will unduly restrict development.	No	<a href="#">Transfer directly...</a>
FS10.2	S207.001	Support	Allow	All	The reasoning provided by the submitter is supported.	No	<a href="#">Transfer directly...</a>
FS10.3	S257.001	Support	Allow	All	Without the definition the term is ambiguous and will unduly restrict development.	No	<a href="#">Transfer directly...</a>
FS10.4	S2.001	Support	Allow	All	The term is ambiguous without a definition and will unduly restrict development.	No	<a href="#">Transfer directly...</a>
FS10.5	S2.002	Support	Allow	All	National Planning Standards should be utilised where possible.	No	<a href="#">Transfer directly...</a>
FS10.6	S206.006	Support	Allow	All	The reasons provided by the submitter are supported	No	<a href="#">Transfer directly...</a>
FS10.7	S285.003	Support	Allow	Clarity is required for consenting of potential cleanfill sites	Cleanfill sites are part of waste infrastructure and must be enabled with appropriate consenting pathways.	No	<a href="#">Transfer directly...</a>
FS10.8	S206.017	Support	Allow	Support the status to become discretionary if not restricted discretionary. Withdrawal of the winter shutdown period is supported unless exclusions are applied to cleanfills, managed fills and landfills.	Cleanfills, managed fills and landfills all need to continue earthworks over the winter period. The rules need to account for these longterm ongoing permanent earthwork activities.	No	<a href="#">Transfer directly...</a>
FS10.9	S225.015	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.10	S206.019	Support	Allow	All	The same reasoning applies to cleanfill, managed fill and landfill sites.	No	<a href="#">Transfer directly...</a>
FS10.11	S206.015	Support	Allow	All	As provided by submission point	No	<a href="#">Transfer directly...</a>



FS10.12	S226.001	Support	Allow	All	Agreed that there needs to be more clarity prevention of double-ups in the rules if network discharge consents control discharges. Should be where discharges cannot comply with network discharge consents then discretionary activity is required.	No	<a href="#">Transfer directly...</a>
FS10.13	S207.003	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.14	S206.009	Support in part	Allow in part	Should apply to cleanfills, managed fills and landfills in recognition of their similar footprint.	Agree that many high risk sites, including cleanfills and landfills would have difficult consenting pathways. Should allow for reasonable works that need to occur on these sites.	No	<a href="#">Transfer directly...</a>
FS10.15	S206.010	Support in part	Allow in part	Such a proposed rule should also apply with cleanfills, managed fills and landfills in accordance to their similar footprint.	As for submission point S206.009	No	<a href="#">Transfer directly...</a>
FS10.16	S206.020	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.17	S33.004	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.18	S101.004	Support in part	Allow in part	All	It is unclear whether the term “unplanned greenfield development” and associated terms also applies to regionally significant waste infrastructure, such as Class 1 landfills. Agree that prohibiting development based on underlying land use zoning does not recognise or account for the ability for requiring authorities to utilise a designation, but waste infrastructure is often delivered by private enterprises. Agree that the strong policy directive to prohibit unplanned greenfield development could be used as the rationale for declining resource consent or recommending the withdrawal of a notice of requirement for regionally significant waste infrastructure projects which often need a rural zoning for reverse sensitivity purposes. Agree that the proposed new “unplanned greenfield development” provisions will potentially curtail proposed development projects despite the significant benefits that will accrue. Agree that the approach to unplanned greenfield development warrants significant rework to ensure that also regionally significant waste infrastructure providers can continue to meet the needs of the region’s community.	No	<a href="#">Transfer directly...</a>
FS10.19	S239.003	Support	Allow	All additions	Proposed exclusions are appropriate	No	<a href="#">Transfer directly...</a>
FS10.20	S285.006	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.21	S43.003	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.22	S206.023	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>

FS10.23	S207.005	Support in part	Allow in part	If removing contaminants then environmentally hazardous substances should be inserted to cover sediment levels, etc.	Agree with general reasoning but definition needs to incorporate environmentally hazardous substances and should be defined by area rather than premise.	No	<a href="#">Transfer directly...</a>
FS10.24	S177.010	Support in part	Allow in part	Agree with deletion of contaminants but definition should refer to environmentally hazardous substances.	Agree with intent but environmentally hazardous substances may be more appropriate to capture sediment concentrations for example.	No	<a href="#">Transfer directly...</a>
FS10.25	S256.002	Support in part	Allow in part	Supports that the definition should apply to areas not the premise.	Many areas of waste sites are indoors with no exposure on roofs of buildings to hazardous substances. Therefore should only apply to exterior areas in these situations.	No	<a href="#">Transfer directly...</a>
FS10.26	S285.008	Support	Allow	All		No	<a href="#">Transfer directly...</a>
FS10.27	S256.005	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.28	S256.006	Support	Allow	All	As per submission point. The definition needs to be clear and allow for waste infrastructure in the rural zones.	No	<a href="#">Transfer directly...</a>
FS10.29	S2.018	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.30	S261.062	Oppose in part	Disallow in part	Delete restoring natural form and character	Restoring natural and character while ideal may not always be practicable, depending on existing urban development.	No	<a href="#">Transfer directly...</a>
FS10.31	S207.008	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.32	S2.019	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.33	S206.038	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.34	S207.009	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.35	S256.010	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.36	S207.011	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.37	S256.011	Support	Allow	All	Agree that policy will not allow for any infrastructure land use developments in the rural zone.	No	<a href="#">Transfer directly...</a>
FS10.38	S206.044	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.39	S43.013	Support	Allow	All	Refer to submission point	No	<a href="#">Transfer directly...</a>
FS10.40	S207.014	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>

FS10.41	S248.034	Support	Allow	All	As per submission point particularly with respect to high risk industrial or trade premises.	No	<a href="#">Transfer directly...</a>
FS10.42	S256.012	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.43	S207.023	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.44	S206.070	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>
FS10.45	S248.055	Support	Allow	All	As per submission point	No	<a href="#">Transfer directly...</a>

## Add Further Submission Point

**Related original Submitter \***

**Related submission point \***

**FS support oppose**

**Reasons**

**Decision sought**

**Decision requested \***

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
  2. You can use the Further Submission Form(s) (Form 6).
    - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
    - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).
- Please send the Further Submission Form in by one of the below methods:
- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
  - Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
  - Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.


## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
<b>Name of Submitter:</b> (First and last name, or organisation / company)	Federated Farmers of New Zealand (Wairarapa)
<b>Address for service:</b> (Email, or physical address) Please note an <u>email address</u> is the preferred method	emcgruddy@fedfarm.org.nz
<b>Phone:</b> (Optional)	
<b>Contact person for submission:</b> (If different to above)	Elizabeth McGruddy
<b>I wish to be heard in support of my submission at a hearing:</b>	Yes
<b>I would consider presenting a joint case at the hearing with others who</b>	No

make a similar submission:	
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	No
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	My organisation represents farming members in the Greater Wellington region

<b>3. For the further submitter to action</b>
Service of your further submission: Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a> . If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		7/03/2024
<p><b>Public information:</b> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: Suggested added text, shown as <b>bolded text</b> format Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul>

Please enter further submission points in the table on the following page(s)

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<p><b>*Submitter name or, Submitter number of the submission you are commenting on:</b></p>	<p><b>*Submission point number:</b> <i>Unique identifying number allocated to each specific <u>submission point</u>, located in the second column of the summary of decisions requested table:</i></p>	<p><b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i></p>	<p><b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i></p>	<p><b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
<p>Heather Phillips S212</p>	<p>S212.002</p>	<p>Support in part</p>	<p>Allow in part</p>	<p><u>Add a Wildfire objective to Chapter 3 (Objectives) of the pNRP.</u></p> <p><u>Identify</u> policies to support the prevention and management of wildfires. Policies could include, for example, maintenance of rural roadside verges to act as fire breaks, controlled burns, setback distances for vegetation around public infrastructure and utilities, installation and maintenance of fire breaks around plantation forests,</p>	<p>Whilst Federated Farmers does not agree with the submitter that the proposed plan promotes the continued planting of pine trees on the highest erosion risk land, we do accept the submitters argument that the plan fails to address the impact of wildfires on the discharge of sediment to catchments, and that the number and extent of wildfires is likely to increase in the future due to the effects of climate change. Federated Farmers considers that</p>

				<p>support for on-farm water storage and requirements for water storage and infrastructure on plantation forestry blocks.</p> <p><u>Identify</u> rules and other methods to support the prevention and management of wildfires.</p>	<p>the plan change process provides the Council with an opportunity to address the prevention and management of wildfires in the region.</p>
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# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
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Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Forest & Bird
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	a.geary@forestandbird.org.nz freshwater@forestandbird.org.nz
Phone: (Optional)	
Contact person for submission: (If different to above)	Amelia Geary
I wish to be heard in support of my submission at a hearing:	Yes
I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes



2. Criteria applicable to Further Submitter:	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Forest & Bird is a New Zealand non-governmental conservation organisation representing its members and supporters, and made a submission on proposed PC1 to the NRP.


**3. For the further submitter to action**

Service of your further submission:

Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**

Each submitter has an address for service available at: [www.gw.govt.nz/nrp-pc1-submissions](http://www.gw.govt.nz/nrp-pc1-submissions).  
 If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

**4. Disclosures:**

If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		8 March 2024
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**Public information:**  
 Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.  
 In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the [Plan Change 1 to the Natural Resources Plan Information Statement](#).  
 You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at [privacy@gw.govt.nz](mailto:privacy@gw.govt.nz).

**5. Further Submission:**

- The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested:
  - [NRP PC 1 - Summary of Decisions Requested – By Submitter](#)
  - [NRP PC 1 - Summary of Decisions Requested – By Provision](#)
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- If you are providing suggested text amendments to a provision, please do so in the following format:
  - Suggested added text, shown as **bolded text** format
  - Suggested deleted text, shown as ~~struckthrough~~ format

**Please enter further submission points in the table on the following page(s)**

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<p><b>*Submitter name or, Submitter number of the submission you are commenting on:</b></p>	<p><b>*Submission point number:</b> <i>Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:</i></p>	<p><b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i></p>	<p><b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i></p>	<p><b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
<p>S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies</p>	<p>S258.008</p>	<p>Oppose</p>	<p>Disallow</p>	<p>Whole submission point.</p>	<p>Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).</p>
<p>S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies</p>	<p>S258.009</p>	<p>Oppose</p>	<p>Disallow</p>	<p>Whole submission point.</p>	<p>Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).</p>
<p>S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies</p>	<p>S258.017</p>	<p>Oppose</p>	<p>Disallow</p>	<p>Whole submission point.</p>	<p>Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).</p>
<p>S260 Cannon Point</p>	<p>S260.001 – S260.019</p>	<p>Oppose</p>	<p>Disallow</p>	<p>Oppose the whole of the submission and all relief sought unless otherwise</p>	<p>Submission points would likely result in the further loss of</p>

Development Limited (Ltd.)				stated or where points are consistent with Forest & Bird's submission points and specific relief.	indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S093 CentrePort Limited	S93.005	Oppose	Disallow	Whole submission point.	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S093 CentrePort Limited	S93.009	Oppose	Disallow	Whole submission point.	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S288 China Forest Group Company New Zealand Ltd	S288.001 – S288.123	Oppose	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S041 Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New	S41.001 – S41.009	Oppose	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).

Zealand Trading Limited					
S222 Environmental Defence Society Inc.	S222.001 – S222.146	Support	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird’s submission points and specific relief.	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S284 Friends of Waiwhetū Stream	S284.003	Support	Allow	Whole submission point.	Bringing timeframe forward will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S238 Greater Wellington Regional Council	S238.001 – S238.037	Support	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird’s submission points and specific relief.	Submission points will help clarify plan provisions.
S186 Guardians of the Bays Inc	S186.048	Support	Allow	Whole submission point	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S186 Guardians of the Bays Inc	S186.049	Support	Allow	Whole submission point	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents,

					including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S186 Guardians of the Bays Inc	S186.052	Support	Allow	Whole submission point	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S012 Horticulture New Zealand	S12.002	Oppose	Disallow	Whole submission point	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S012 Horticulture New Zealand	S12.003	Oppose	Disallow	Whole submission point	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S012 Horticulture New Zealand	S12.004	Oppose	Disallow	Whole submission point	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S012 Horticulture New Zealand	S12.005	Oppose	Disallow	Whole submission point	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).

S012 Horticulture New Zealand	S12.006	Oppose	Disallow	Whole submission point	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S012 Horticulture New Zealand	S12.007	Oppose	Disallow	Whole submission point	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S012 Horticulture New Zealand	S12.008	Oppose	Disallow	Whole submission point	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S012 Horticulture New Zealand	S12.009	Oppose	Disallow	Whole submission point	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S012 Horticulture New Zealand	S12.010	Support	Allow	Whole submission point	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).

S211 Hutt City Council	S211.001 – S211.025	Oppose	Disallow	Oppose all submission points seeking to amend proposed 2040 E.coli target timeframe to 2060.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S263 New Zealand Carbon Farming Group (NZCF)	S263.001 – S263.032	Oppose	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S195 New Zealand Farm Forestry Association (NZFFA)	S195.001 – S195.051	Oppose	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird's submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S085 Rangitāne o Wairarapa	S85.001 – S85.008	Support	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird's submission points and specific relief.	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S245 Tama Potaka, Minister of Conservation	S245.001	Oppose	Disallow	Whole submission point.	Submission point would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).

S245 Tama Potaka, Minister of Conservation	S245.002 – S245.106	Support	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird’s submission points and specific relief.	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S116 Taumata Arowai	S116.001 – S116.126	Support	Allow	Support the whole of the submission and all relief sought unless otherwise stated or where points are inconsistent with Forest & Bird’s submission points and specific relief.	Submission points will assist with plan clarity and help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S275 The New Zealand Transport Agency	S275.001 – S275.049	Oppose	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S177 Transpower New Zealand Limited	S177.001 – S177.085	Oppose	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S225 Upper Hutt City Council	S225.001 – S225.128	Oppose	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).



S193 Wairarapa Federated Farmers	S193.001 – S193.200	Oppose	Disallow	Oppose the whole of the submission and all relief sought unless otherwise stated or where points are consistent with Forest & Bird’s submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S188 Wellington Fish and Game Regional Council	S188.001 – S188.097	Support	Allow	Support the whole of the submission and all relief sought be unless otherwise stated or where points are inconsistent with Forest & Bird’s submission points and specific relief.	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S101 Wellington International Airport Limited	S101.001 – S101.074	Oppose	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird’s submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S151 Wellington Water Ltd	S151.001 – S151.183	Oppose	Disallow	Oppose the whole of the submission and all relief sought except for where points are consistent with Forest & Bird’s submission points and specific relief.	Submission points would likely result in the further loss of indigenous biodiversity and degradation of waterways throughout Wellington and be inconsistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).
S113 Zealandia Te Māra a Tāne	S113.001 – S113.015	Support	Allow	Support the whole of the submission and all relief sought be unless otherwise stated or where points are inconsistent with Forest & Bird’s submission points and specific relief.	Submission points will help maintain, protect, and restore indigenous biodiversity and waterways throughout Wellington and are consistent with higher order documents, including the NPS-FM, the NPS-IB, the NZCPS, and the RMA (including s6).

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.


## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Gillies Group Management Limited
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	C/- Scope Planning Stephanie@scopeplanning.co.nz
Phone: (Optional)	Insert
Contact person for submission: (If different to above)	Insert
I wish to be heard in support of my submission at a hearing:	Yes
I would consider presenting a joint case at the hearing with others who	No

make a similar submission:	
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Gillies Group Management Limited is a leading property developer with a number of existing and ongoing development interests throughout the Wellington Region.

<b>3. For the further submitter to action</b>
Service of your further submission: Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b> Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a> . If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		29 February 2024
<b>Public information:</b> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a> . You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a> .		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested:           <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: Suggested added text, shown as <b>bolded text</b> format Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul>

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b> <i>Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:</i>	<b>*Stance on the submission point:</b> <i>(i.e. the further submitters stance on the original submission)</i>	<b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i>	<b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
Upper Hutt City Council	S225.002	Support	Allow	Support submission point in full	Support this submission point that seeks a that GWRC undertakes a full legal and natural justice review of the provisions in light of the evolving national direction;
Upper Hutt City Council	S225.003	Support	Allow	Support submission point in full	Supports this submission point that seeks to amend the provisions to remove actions that conflict with or are more onerous than the 2023 National led government direction included in the Incoming Government Coalition agreements, November 2023 and letter from Chris Bishop dated 13 December 2023 which identifies changes to RMA, NPSFM, NESFW and NPS-IB prior to end of 2023.
Upper Hutt City Council	S225.006	Support	Allow	Support submission point in full	Support the need to amend the plan change to correctly implement national planning standards.
Upper Hutt City Council	S225.007	Support	Allow	Support submission point in full	Support the need to significantly amend the provisions which have a lack of higher

					order document direction or evidentiary support.
Upper Hutt City Council	S225.008	Support	Allow	Support submission point in full	Support the need to delete or significantly amend provisions which lack of any consideration of scale and significance and apply to all development without appropriate thresholds;
Upper Hutt City Council	S225.009	Support	Allow	Support submission point in full	Support the need to delete the addition of onerous requirements for existing consents;
Upper Hutt City Council	S225.014	Support	Allow	Support submission point in full	Support the need to delete provisions prohibiting urban expansion beyond existing urban zoned land, particularly where this does not align with recent rezoning notified before this plan change;
Upper Hutt City Council	S225.015	Support	Allow	Support submission point in full	Support the need to delete or significantly amend hydrological controls for all development, which are going beyond hydraulic neutrality, as these are unclear and seem to be overly onerous;
Upper Hutt City Council	S225.019	Support	Allow	Support submission point in full	Support the need to amend the proposed definition of a 'drain' that would result in all drains being considered 'modified streams'
Upper Hutt City Council	S225.023	Support	Allow	Support submission point in full	Agrees that there are fundamental issues with provisions requiring revision or deletion to ensure PC1 is reasonable, legally robust and practical to implement.
Upper Hutt City Council	S225.025	Support	Allow	Support submission point in full	Agrees with the concerns raised in relation to process, timing, and sequencing of aspects of the notified provisions of PC1. Agrees that there are numerous instances throughout PC1 where little regard to national policy direction and principles of natural justice have been considered and reasonableness /evidence base and practical implementation of provisions has been inconsistently applied.

Upper Hutt City Council	S225.026	Support	Allow	Support submission point in full	Agrees with the concerns raised that PC1 circumvents or undermines national directives. Concerned provisions will make urban development required by NPS-UD potentially impossible to deliver, through wrapping constraints around housing intensification direction.
Upper Hutt City Council	S225.032	Support	Allow	Support submission point in full	Agrees with the amendments sought to the definition of earthworks to reintroduce the exclusions.
Upper Hutt City Council	S225.046	Support	Allow	Support submission point in full	Supports the amendments sought to the definition of stormwater treatment system to provide flexibility.
Upper Hutt City Council	S225.048	Support	Allow	Support submission point in full	Supports amendments to the unplanned greenfield development map.
Upper Hutt City Council	S225.067	Support	Allow	Support submission point in full	Agrees with the amendments to Policy WH.P2 to seek that unplanned development is managed and not prohibited.
Upper Hutt City Council	S225.075	Support	Allow	Support submission point in full	Agree that the scope of Policy WH.P10 should be narrowed to apply only to stormwater networks not individual developments within a network, except for point source discharges to surface water.
Upper Hutt City Council	S225.077	Support	Allow	Support submission point in full	Agrees that is inappropriate and unjust to require onsite stormwater systems to be installed, due to the 'like for like' replacement of impervious surfaces. Considers this places unnecessary burden on land owners seeking to undertake maintenance of their properties.
Upper Hutt City Council	S225.078	Support	Allow	Support submission point in full	Agrees with the concerns raised in relation to financial contributions.
Upper Hutt City Council	S225.093	Support	Allow	Support submission point in full	Agrees with the request to delete Policy WH.P31 relating to winter works.

Upper Hutt City Council	S225.098	Support	Allow	Support submission point in full	Supports the request to delete or amend the thresholds and financial contributions specified in Rule WH.R6.
Upper Hutt City Council	S225.099	Support	Allow	Support submission point in full	Agrees with the concerns raised with the implications of this rule that would mean application of financial contributions and costly significant upgrades, given requirements to both include costly stormwater systems within developments, as well as pay financial contributions under schedule 30 (i.e. double dipping of cost).
Upper Hutt City Council	S225.100	Support	Allow	Support submission point in full	Agrees with the concerns raised with the implications of this rule that would mean application of financial contributions and costly significant upgrades, given requirements to both include costly stormwater systems within developments, as well as pay financial contributions under schedule 30 (i.e. double dipping of cost).
Upper Hutt City Council	S225.102	Support	Allow	Support submission point in full	Agrees with the concerns raised regarding the implications of the 'redevelopment' definition and lack of thresholds in Rule WH.R11 for redevelopment.
Upper Hutt City Council	S225.104	Support	Allow	Support submission point in full	Agrees with the concerns with the implications and practicality of Rule WH.R13.
Upper Hutt City Council	S225.120	Support	Allow	Support submission point in full	Agrees that the rationale and basis for the proposed financial contributions needs to be reviewed.
Upper Hutt City Council	S225.127	Support	Allow	Support submission point in full	Agrees that the erosion prone maps need to be amended to align with district council hazard mapping.
Upper Hutt City Council	S225.128	Support	Allow	Support submission point in full	Agrees that the erosion prone maps need to be amended to align with district council hazard mapping.

					Agrees that the erosion prone maps need to be amended to align with district council hazard mapping.
Porirua City Council	S240.010	Support	Allow	Support submission point in full	Agrees that the definition of hydrological control needs to be amended to assist in implementation of associated rules.
Porirua City Council	S240.014	Support	Allow	Support submission point in full	Supports amendments to the definition of unplanned greenfield development to provide a consenting pathway for a proposal located in these areas that may have positive outcomes, including for freshwater, housing supply and business zoned land.
Porirua City Council	S240.033	Support	Allow	Support submission point in full	Agrees that the prohibition of unplanned greenfield development may result in unintended consequences with no consenting pathway to consider a proposal located in this area that may have positive outcomes, including for freshwater, housing supply and business zoned land.
Porirua City Council	S240.046	Support	Allow	Support submission point in full	Agrees that Policy P.P15 should be deleted as there is insufficient evidence base to support the prohibition of unplanned greenfield development.
Porirua City Council	S240.060	Support	Allow	Support submission point in full	Agrees that the current approach to winter works management should be maintained and agrees that Policy P.P29 should be deleted.
Kāinga Ora	S257.009	Support	Allow	Support submission point in full	Agrees that a full review of and expansion to the areas identified as existing, new and future urban areas.
Kāinga Ora	S257.019	Support	Allow	Support submission point in full	Agrees that the policy and associated rules introduces a significant cost to developers on a site. Also agrees that Policy WH.P14 reads like a rule and would be difficult to achieve through redevelopment of existing



					urban environments and could discourage brownfield development.
Kāinga Ora	S257.020	Support	Allow	Support submission point in full	Agree that the policy and rules relating to financial contributions should be deleted.
Kāinga Ora	S257.021	Support	Allow	Support submission point in full	Agree that the policy and rules relating to unplanned urban development should be deleted as there is not sufficient evidence base to treat unplanned greenfield development differently to planned development.
Kāinga Ora	S257.026	Support	Allow	Support submission point in full	Agrees that winter works can be adequately dealt with as a matter of discretion or via current practice.
Kāinga Ora	S257.028	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.029	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.030	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.031	Support	Allow	Support submission point in full	Agrees that WH.R11(b) does not provide alternative framework applicable to catchment based solutions for attenuation, control and treatment associated with "greenfield development", and doesn't allow for a corresponding reduction in cases where treatment exceeds the 85% requirement.

Kāinga Ora	S257.032	Support	Allow	Support submission point in full	Agrees with the removal of reference to financial contributions
Kāinga Ora	S257.038	Support	Allow	Support submission point in full	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.
Kāinga Ora	S257.048	Support	Allow	Support submission point in full	Agrees that the financial contributions policy and associated rules should be deleted.
Kāinga Ora	S257.054	Support	Allow	Support submission point in full	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.
Kāinga Ora	S257.056	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.057	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.058	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.059	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.064	Support	Allow	Support submission point in full	Agrees that an exclusion needs to be added to the earthworks permitted activity rule that exempts activities associated with the trenching of services.

Kāinga Ora	S257.065	Support	Allow	Support submission point in full	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.
Kāinga Ora	S257.067	Support	Allow	Support submission point in full	Agrees that the policies, rules and schedules relating to financial contributions should be deleted.
Summerset Group Holdings Limited	S38.001	Support	Allow	Support submission point in full	Agrees that the definition of hydrological control needs to be amended to provide more specificity about what they actually are.
Summerset Group Holdings Limited	S38.002	Support	Allow	Support submission point in full	Agrees that roofing with rainwater collection complying with hydraulic neutrality rules should not be considered an impervious surface.
Summerset Group Holdings Limited	S38.007	Support	Allow	Support submission point in full	Agrees that the cost of the 85% treatment requirement on landowners/ developers, and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation, it is potentially inconsistent with the NPS-UD.
Summerset Group Holdings Limited	S38.010	Support	Allow	Support submission point in full	Agrees that the s32 statement that there is a higher risk for discharges of sediment over the winter months is incorrect.

Please enter your details below:

### 1. Details of further submitter:

* <b>Submitter Name:</b> Full name, or Name of Organisation / Company	Goodman Contractors Limited
<b>Contact person for submission:</b> (If different to above)	Marianne Archer
<b>Telephone no:</b> (Not required)	Optional
* <b>Address for service:</b> (Email, or physical address) Please note, an <u>email address</u> is the preferred method	<a href="mailto:marianne@goodmans.nz">marianne@goodmans.nz</a>
* <b>I wish to be heard in support of my submission at a hearing</b>	No
* <b>I would consider presenting a joint case at the hearing with others who make a similar submission</b>	Yes

### 2. Criteria applicable to Further Submitter:

* <b>Only certain people may make further submissions Please select the option that applies to you:</b>	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
* <b>Specify the reasoning behind why you qualify for either of these above options:</b>	I am making this further submission under criteria A because the ability to conduct earthworks for transport and water construction is of great public benefit, and therefore in the public interest. I am also making this further submission under criteria B, because I work in a civil construction business that will be directly impacted by the changes.

### 3. For the further submitter to action

<p>Service of your further submission: Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b> Each submitter has an address for service available at: <a href="#">NRP PC1 Address for Service</a></p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>
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### 4. Disclosures:

If providing a submission on behalf of a company / organisation

I confirm that I have authority to do so:



Date:

8/03/2024

Public information:

Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.

In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the below:

[Plan Change 1 to the Natural Resources Plan Information Statement.](#)

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at [privacy@gw.govt.nz](mailto:privacy@gw.govt.nz).

#### 5. Further Submission:

- The original submissions received have been summarised into submission points and collated into one summary table.

This document(s) is a Summary of Decisions Requested:

[NRP PC 1 - Summary of Decisions Requested – By Submitter](#)

[NRP PC 1 - Summary of Decisions Requested –By Provision](#)

- Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.

- If you are providing suggested text amendments to a provision, please do so in the following format:

- Suggested added text, shown as **bolded text** format

- Suggested deleted text, shown as ~~striketrough~~ format

Please enter your Further Submission in the next worksheet. All of the original submitters and their associated submission points on the proposed change have been included so please place your comments in the corresponding cells.

If you have questions on how to use this submission form please email one of our friendly team at [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

Natural Recourses Plan: Chapter	Natural Recourses Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Filter original submission point by the chapter location	Filter original submission point by specific provision title	Filter by the original submitter Name and associated Submitter Number	Unique identifying number allocated to each specific submission point	Support Oppose Support in part Oppose in part Not stated	Allow Disallow Allow in part Disallow in part	Illustrate which aspects of this original submission that you support or oppose.  Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.	Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
General comments	<b>Earthworks</b>	S285 - Civil Contractors New Zealand	S285.003	Support	Allow	GWRC to take more responsibility for planning and consenting appropriate cleanfill site locations across the region, especially if this material must be disposed of at an official cleanfill site. The wording 'to a cleanfill site' should be removed in the short term, as there are very few available sites.	The region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill, and this is escalating project costs. If this single remaining site fills up, shipping cleanfill out of the region will greatly escalate cost and reduce project efficiency.
Chapter 2	<b>Earthworks</b>	S285 - Civil Contractors New Zealand	S285.006	Support	Allow	Reinstate the previous definition of earthworks. Remove 'to a cleanfill area' from the point in definition for 'all other whaitua'.	Changing the definition of earthworks will require considerable resource from industry to understand and implement. The existing definition of earthworks is well understood, and the complication arising from a new definition for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua is not needed. The addition of 'to a cleanfill area' to 2.2 (i) is problematic as there are significant constraints around sites in the region at the moment and the availability of cleanfill sites needs to be taken into account. If it is not, this will hamper the ability to deliver infrastructure projects The new definition proposed may also result in a significant rise in consent applications being required for minor pipe or road repairs, which is something that should be avoided as it will not add value and council is unlikely to be resourced to handle the required volume of consent applications in a timely way.

Chapter 8	Table 8.4: Target attribute states for rivers.	S285 - Civil Contractors New Zealand	S285.018	Support	Allow	Delete specific reference to test methodologies from the plan and handle site testing based on the nature of the site and its location. Or, (minimum) make sure the test method used is industry appropriate, and not increasing cost without adding value.	Test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked (consider pumice vs iron sand) and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.
Chapter 8	Policy WH.P31: Winter shut down of earthworks.	S285 - Civil Contractors New Zealand	S285.019	Support	Allow	Delete policy WH.P31 If amended rather than deleted, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. Increasing hard shutdown of work sites over winter is not tenable for the region's civil construction industry.	This policy will be catastrophic for the region, and greatly reduce contractor capacity. A 'hard shutdown' over winter will render civil construction and earthmoving companies unable to retain staff (impossible to hold a job where you cannot work for four months of the year). In turn, this will increase project costs significantly. The plan change also does not take into account differences in material worked or terrain and that some winter works must be allowed via resource consents or some other avenue, if the site meets certain criteria. Notes some jobs (sand jobs) have much less sediment and runoff in rainfall and winter is actually a better time for these jobs to run, as there is less dust.
Chapter 8	Rule WH.R6: Stormwater from new greenfield impervious surfaces –	S43 - Fulton Hogan Ltd	S43.015	Support	Allow		

	controlled activity.						
Chapter 8	Rule WH.R23: Earthworks – permitted activity.	S285 - Civil Contractors New Zealand	S285.024	Support in part	Allow	Amend Rule WH.R23 to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.	It is important rules of this nature are as simple and easy to apply as possible. Many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. We are concerned council would not have capacity to perform this work on a timely basis.
Chapter 8	Rule WH.R24: Earthworks – restricted discretionary activity.	S285 - Civil Contractors New Zealand	S285.025	Support	Allow	Amend policy WH.R24 (b) If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).	The shutdown of earthworks between 1 June and 30 September is inappropriate as works can be managed during this period with no adverse effects. Test methodologies should add value rather than just adding complexity and cost, and be appropriate to how monitoring occurs on site. The industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids (inappropriate as different materials have a different weight - i.e. iron sand vs pumice).
Chapter 8	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara – restricted discretionary activity.	S285 - Civil Contractors New Zealand	S285.026	Support	Allow	Amend to consider use of standpipes, water use on infrastructure projects and emergency water take	This policy needs to better reflect the realities around water use in projects and work sites, or it could inflict significant delay on works and hamper ability of contractors and emergency services to respond.



Chapter 9	Policy P.P28: Discharge standard for earthworks sites.	S285 - Civil Contractors New Zealand	S285.030	Support	Allow	Strongly amend to remove prevention of winter work permits, amend to either specify which sort of test is used and leave this to implementation guidance, or refer to the correct on-site test method (NTU).	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.
Chapter 9	Policy P.P29: Winter shut down of earthworks.	S285 - Civil Contractors New Zealand	S285.031	Support	Allow	Amend policy P.P29 (a) to ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled	A hard shutdown of earthworks between 1 June and 30 September is inappropriate as many works may be able to be managed during this period with no adverse effects. A hard shutdown should be avoided where possible, as this creates the situation where companies cannot retain staff, and the region will lose capability and capacity, as well as facing much higher costs and extended project timeframes due to staffing shortages and severely restricted ability to carry out works.
Chapter 9	Rule P.R22: Earthworks – permitted activity.	S285 - Civil Contractors New Zealand	S285.032	Support in part	Allow in part	Amend the definition of earthworks that governs Rule P.R22, to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines.	Many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits but would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Does council have capacity to consent this additional workload on a timely basis?

						Any consequential amendments, to other relevant provisions, which are in general accordance with this request.	
Chapter 9	Rule P.R23: Earthworks – restricted discretionary activity.	S285 - Civil Contractors New Zealand	S285.033	Support	Allow	Amend policy P.R23 (b), which proposes inappropriate and excessive shutdown of earthworks over winter. Ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'. Amend to either leave this to implementation guidance specify which sort of test is used , or refer to the correct on-site test method (NTU)	The shutdown of earthworks between 1 June and 30 September is inappropriate as works may be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.

07/03/2024

Dear Greater Wellington Regional Council,

I am writing in support of the submission made by Civil Contractors New Zealand on your proposed Natural Resources Proposed Plan Change 1.

I request that you consider the feedback made in the submission, and the impact proposed changes may have on the local civil construction industry, and the region's ability to carry out infrastructure projects.

Specifically, and with priority I request that you:

- Do not proceed with your proposal to implement different definitions of earthworks in different part of the region. This will only result in added cost and confusion. Please retain the existing definition of earthworks.
- Delete policy WH.P30: Discharge standard for earthworks. The proposed test methodology is not fit for purpose, and this should instead be handled in consent conditions depending on the nature of the site where the earthworks are taking place.

If the policy is to remain, the test methodology should be handled in guidance depending on the site and its surroundings, not as a blanket rule in the Natural Resources Plan itself.

- Delete policy WH.R23, which is written in a way that may require resource consent for basic works and emergency maintenance of transport and water networks, and in turn may overload council consenting capacity. If you do not delete this, please remove the reference to a hard shutdown of earthworks over winter and allow appropriate exceptions to this.
- Delete policy P.R24 (which treats earthworks as a non-complying activity, and should instead treat it as a restricted discretionary activity).
- Delete policy WH.P31 and P.P29, which dictate hard shutdowns of earthworks sites for four months of the year. This policy will be disastrous for the regional industry, as it will prevent companies from retain earthmoving staff over those months. In turn, this will greatly escalate project cost and the ability for projects to proceed across the region. And if it is applied to sites that are already well-managed, it will create cost and disruption while adding no value. This approach must be reconsidered.
- Consider in P.R31, P.R32, P.R33 water usage for emergency works and essential environmental controls – i.e. dust control.

I also support the rest of the points made in the Civil Contractors New Zealand submission, and ask you to consider the impacts this plan change will have on horizontal construction across the region, which will increase costs across the board, including housing, transport and water construction.

Overall, I feel direct consultation with the civil construction industry has been absent in the creation of this plan, and is required to make sure the Natural Resources Plan is fit for purpose. I also feel that the consultation process is very difficult to follow, ruling most



contractors out of having a say. Accordingly, I request the plan change does not go ahead.

Yours sincerely




Marianne Archer  
Director

**e** [marianne@goodmans.nz](mailto:marianne@goodmans.nz)

**m**

Please enter your details below:

**1. Details of further submitter:**

<b>* Submitter Name:</b> Full name, or Name of Organisation / Company	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust
<b>Contact person for submission:</b> (If different to above)	Chris Hansen
<b>Telephone no:</b> (Not required)	
<b>* Address for service:</b> (Email, or physical address) Please note, an <u>email address</u> is the preferred method	<a href="mailto:chris@rmaexpert.co.nz">chris@rmaexpert.co.nz</a>
<b>* I wish to be heard in support of my submission at a hearing</b>	Yes
<b>* I would consider presenting a joint case at the hearing with others who make a similar submission</b>	Yes


**2. Criteria applicable to Further Submitter:**

<b>* Only certain people may make further submissions Please select the option that applies to you:</b>	
<b>A) I am a person representing a relevant aspect of the public interest; or</b>	Yes
<b>B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or</b>	Yes
<b>C) I am the local authority for the relevant area.</b>	No
<b>* Specify the reasoning behind why you qualify for either of these above options:</b>	Submitters are addressing the need for housing in the Hutt Valley; submitters own land affected by PC1; submitters operate a commercial forest that is affected by PC1

**3. For the further submitter to action**

<p>Service of your further submission: Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b> Each submitter has an address for service available at: <a href="#">NRP PC1 Address for Service</a></p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>
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**4. Disclosures:**

<p>If providing a submission on behalf of a company / organisation <b>I confirm that I have authority to do so:</b></p>	
<b>Date:</b>	8-Mar-24

Public information:

Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.

In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the below:

[Plan Change 1 to the Natural Resources Plan Information Statement.](#)

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at [privacy@gw.govt.nz](mailto:privacy@gw.govt.nz).

## 5. Further Submission:

- The original submissions received have been summarised into submission points and collated into one summary table.

This document(s) is a Summary of Decisions Requested:

[NRP PC 1 - Summary of Decisions Requested – By Submitter](#)

[NRP PC 1 - Summary of Decisions Requested –By Provision](#)

- Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.

- If you are providing suggested text amendments to a provision, please do so in the following format:

- Suggested added text, shown as **bolded text** format

- Suggested deleted text, shown as ~~striketrough~~ format

Please enter your Further Submission in the next worksheet. All of the original submitters and their associated submission points on the proposed change have been included so please place your comments in the corresponding cells.

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Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Filter by the original submitter Name and associated Submitter Number	Unique identifying number allocated to each specific submission point	Support Oppose Support in part Oppose in part Not stated	Allow Disallow Allow in part Disallow in part	Illustrate which aspects of this original submission that you support or oppose.  Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.	Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
S36 - Wellington Branch of New Zealand Farm Forestry Association	S36.010	Support	Allow	The withdrawal of the prohibition on harvesting forests	Submission is consistent with GTC's own submission and recognises the NES-CF addresses the concerns relating to managing adverse effects of commercial forests (as outlined in by the submitter in S36.013)
S36 - Wellington Branch of New Zealand Farm Forestry Association	S36.020	Support	Allow	Commission a technical review of the mapping of highest risk erodible land	Submission is consistent with GTC's own submission and the concern regarding the accuracy of the Maps showing high risk erodible land
S36 - Wellington Branch of New Zealand Farm Forestry Association	S36.012	Support	Allow	Explore other ways of mitigating risk of erosion from steep slopes after harvesting rather than prohibiting Plantation Forestry	Submission is correct in identifying the need for input from experienced soil conservators and seeks other ways of mitigating the risk of erosion from steep slopes after harvesting rather than using the prohibited activity approach opposed by GTC in it's own submission
S225 - Upper Hutt City Council	S225.006	Support	Allow	Amend to correctly implement national planning standards	Request represents good planning practice and assists in the implementation of the NRP
S225 - Upper Hutt City Council	S225.007	Support	Allow	Delete or significantly amend provisions which have a lack of higher order document direction or evidentiary support	Request represents good planning practice and has legal merit
S225 - Upper Hutt City Council	S225.015	Support	Allow	Delete or significantly amend hydrological controls for all development, which are going beyond hydraulic neutrality, as these are unclear and seem to be overly onerous	Request represents good planning practice and is pragmatic and reasonable
S225 - Upper Hutt City Council	S225.005	Support	Allow	Amend maps as requested in submission	Submission is consistent with GTC's own submission and the concern regarding the accuracy of the Maps at a property scale and using correct data, particularly Map 88
S225 - Upper Hutt City Council	S225.017	Support	Allow	Delete or amend rules surrounding plantation forestry trying to provide a higher level of protection than currently allowed under NES-CF	Submission is consistent with GTC's own submission and the concern regarding the level of control on commercial

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					forestry being onerous and not consistent with the requirements of the NES-CF
S225 - Upper Hutt City Council	S225.020	Support	Allow	Delete or amend the additional financial contributions relating to stormwater management	Submission raises key matter regarding lack of justification and an understanding of monitoring of these projects
S225 - Upper Hutt City Council	S225.014	Support	Allow	Delete provisions prohibiting urban expansion beyond existing urban zoned land, particularly where this does not align with recent rezoning notified before this plan change	Submission is consistent with GTC's own submission and the concern regarding unnecessary and onerous prohibiting of urban expansion beyond existing urban zoned land which is not good planning practice and contrary to the NPS-UD
S225 - Upper Hutt City Council	S225.048	Support	Allow	Amend date by which provisions apply to when Decisions are released on PC1	Amendment is considered pragmatic and appropriate and will allow planning processes (including zone changes through PC50 to the Upper Hutt District Plan) to proceed and be completed which is good planning practice
S225 - Upper Hutt City Council	S225.009	Support in part	Allow in part	Delete or amend Rule WH.R6 to remove thresholds and financial contributions	Submitter raises a real concern that application of financial contributions could result in double dipping which is inappropriate and does not represent good planning practice
S225 - Upper Hutt City Council	S225.104	Support	Allow	Delete rule or amend Rule WH.R13 to change from prohibited and provide a consenting pathway for unplanned greenfield developments	Submission is consistent with GTC's own submission and the concern regarding prohibiting unplanned greenfield development which does not represent good planning practice, does not implement the NPS-UD or achieve the purpose of the RMA
S225 - Upper Hutt City Council	S225.120	Support in part	Allow in part	Remove requirements to pay financial contributions	Submitter raises a real concern that application of financial contributions could result in double dipping which is inappropriate and does not represent good planning practice
S237 - John Turkington Limited	S237.009	Support	Allow	Rules to be consistent with NES-CF	Request is consistent with GTC submission that seeks the NRP to rely on the requirements of the NES-CF to address water quality affects associated with commercial forestry which are considered appropriate; more rigorous requirements in the NRP are not considered necessary to implement the NPS-FM or to achieve the purpose of the RMA
S237 - John Turkington Limited	S237.011	Support in part	Allow in part	Council to provide evidence that NES-CF is insufficient to meet the objectives of water quality, ecosystem health and mana whenua values before progressing with PC1	Submission is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF
S206 - Winstone Aggregates	S206.020	Support	Allow	Retain financial contribution offsetting as optional	Request represents good planning practice as the PC1 provides for other forms of aquatic offsetting and aquatic compensation is enabled where aquatic offsetting cannot be



Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					achieved and retaining financial contribution offsetting as an option is appropriate
S206 - Winstone Aggregates	S206.022	Support	Allow	Review PC1 - Only provisions where freshwater is the primary issue to be subject to FPP - remaining provisions allocated to Schedule 1 process	Request represents good planning practice and has legal merit
S206 - Winstone Aggregates	S206.025	Support	Allow	Update mapping with accurate evidence based mapping or delete definition and retain existing NRP definition; if definition retained, seek it be subject to the Part 1 Schedule 1 Process and not the FPP	Submission is consistent with GTC's own submission and the concern regarding the accuracy of mapping and the provisions being subject to the Part 1 Schedule 1 Process and not the FPP
S206 - Winstone Aggregates	S206.042	Support	Allow	Amend Policy WH.P15 as requested by submitter	While GTC sought for Policy WH.P15 to be retained as written in it's original submission, in principle GTC supports the amendments sought to better clarify how aquatic effects will be managed through aquatic offsetting or aquatic compensation that represents good planning practice that would implement the NPS-FM and achieve the purpose of the RMA
S206 - Winstone Aggregates	S206.053	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S206 - Winstone Aggregates	S206.057	Support in part	Allow in part	Consider Rule WH.R18 under a Part 1 Schedule 1 process	Request represents good planning practice and has legal merit
S206 - Winstone Aggregates	S206.058	Support in part	Allow in part	Consider Rule WH.R19 under a Part 1 Schedule 1 process	Request represents good planning practice and has legal merit
S177 - Transpower New Zealand Limited	S177.007	Support	Allow	Remove mandatory requirement for financial contributions as a condition of rules relating to stormwater management	Request represents good planning practice and has legal merit
S177 - Transpower New Zealand Limited	S177.035	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S177 - Transpower New Zealand Limited	S177.040	Support	Allow	Relocate rule to be part of the Part 1 Schedule 1 Process, and not the FPP	Request represents good planning practice and has legal merit
S188 - Wellington Fish and Game	S188.012	Oppose	Disallow	Retain the intent and wording of Policy WH.P10 as notified	The need to demonstrate functional need is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Regional Council					
S188 - Wellington Fish and Game Regional Council	S188.013	Oppose	Disallow	Retain the current approach in the objectives and policies and not add the requirement to demonstrate functional need	The need to demonstrate functional need is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.002	Oppose in part	Disallow in part	Retain Target Attribute States as per notified PC1	The need for the additional TAS relating to 'natural form and character' is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.049	Oppose in part	Disallow in part	Retain the wording of Objective WH.O1 as notified, subject to the amendment sought by GTC in their original submission	The need to add a reference to 'ephemeral watercourses' is opposed as including these waterbodies in the objective is unnecessary and impractical and is not necessary to implement the NPS-FM or the purpose of the RMA is achieved
S261 - Forest & Bird	S261.050	Oppose in part	Disallow in part	Retain the wording of Objective WH.O2 as notified, subject to the amendment sought by GTC in their original submission	The need to add a reference to 'ephemeral watercourses' and 'natural form and character' is opposed as including these waterbodies in the objective is unnecessary and impractical and is not necessary to implement the NPS-FM or the purpose of the RMA is achieved
S261 - Forest & Bird	S261.060	Oppose	Disallow	Retain wording of Objective WH.O9 as notified	The need for the additional wording 'natural form and character' is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.062	Oppose in part	Disallow in part	Retain the wording of Policy WH.P1 as notified, subject to the amendment sought by GTC in their original submission	The need for the additional wording 'natural form and character' and the requirement to restore natural form and character is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.063	Oppose	Disallow	Retain the wording of Policy WH.P2 as notified, subject to the amendment sought by GTC in their original submission	The need to prohibit and avoid adverse effects of unplanned greenfield development; include ephemeral watercourses; and prohibiting land use intensification that individually or collectively may lead to a decline in water quality is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
S261 - Forest & Bird	S261.067	Oppose	Disallow	Retain the wording of Policy WH.P5 as notified	The need to amend the policy to apply to all discharges is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.089	Oppose	Disallow	Retain the wording of Policy WH.P28 as notified, subject to the amendment sought by GTC in their original submission	The need to add direction regarding large setbacks and a cap on the area logged in one harvest is not necessary in the NRP as the requirements of the NES-CF should take precedence; retaining of clause (c) is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.090	Oppose	Disallow	Retain the wording of Policy WH.P29 as notified	The need to require setback distances is not required in the NRP as the NES-FM and NES-CF already addresses this matter
S261 - Forest & Bird	S261.099	Oppose	Disallow	Retain permitted activity status of Rule WH.R5 as notified	The need to reclassify the activity status to controlled is not necessary as the permitted activity conditions are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S261 - Forest & Bird	S261.100	Oppose	Disallow	Retain controlled activity status of Rule WH.R6 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of control are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S261 - Forest & Bird	S261.110	Oppose	Disallow	Retain the wording of Rule WH.R17 as notified	The additional standards sought by the submitter include matters already addressed in the NES-FM and are not required in the NRP and are not necessary to implement the NPS-FM or to achieve the purpose of the RMA; including reference to ephemeral watercourses is unnecessary and inappropriate
S261 - Forest & Bird	S261.111	Oppose	Disallow	Retain controlled activity status of Rule WH.R18 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of control are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S261 - Forest & Bird	S261.113	Oppose	Disallow	Retain controlled activity status of Rule WH.R20 as notified, subject to amendment sought by GTC in their original submission	If the rule remains, the need to reclassify the activity status to discretionary is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.116	Oppose	Disallow	Retain the wording of Rule WH.R23 as notified	The additional standards sought by the submitter include matters already addressed in the NPS-FM and are not required in the NRP and are not necessary to implement the NES-FM or to achieve the purpose of the RMA; including

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					reference to ephemeral watercourses is unnecessary and inappropriate
S261 - Forest & Bird	S261.117	Oppose	Disallow	Retain restricted discretionary activity status of Rule WH.R24 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of discretion are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S169 - KORU HOMES NZ LIMITED	S169.006	Support in part	Allow in part	Delete clause (a) from Policy WH.P2 regarding the need for financial contributions for greenfield development	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.007	Support in part	Allow in part	Delete reference to financial contributions from Policy WH.P10	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.008	Support in part	Allow in part	Delete reference to financial contributions from Policy WH.P15	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.013	Support in part	Allow in part	Delete reference to financial contributions from Rule WH.R5	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.014	Support in part	Allow in part	Delete reference to financial contributions from Rule WH.R6	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.016	Support in part	Allow in part	Delete reference to financial contributions from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.036	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S286 - Taranaki Whānui	S286.004	Support	Allow	Freshwater effects of development of unplanned greenfield development addressed through resource consent process and not a regional plan change	Request represents good planning practice and is necessary to achieve the purpose of the RMA including s.6 matters
S286 - Taranaki Whānui	S286.032	Support	Allow	Amendments to Clause (a) of Policy WH.P2 as sought by submitter	Request represents good planning practice and addresses issue raised by submitter regarding the policy imposing costs and impacts on them developing their ancestral lands; amendment will ensure the purpose of the RMA achieved, including s.6 matters
S286 - Taranaki Whānui	S286.047	Support	Allow	Delete Policy WH.P16	Request is consistent with GTC submission; represents good planning practice; and addresses issue raised by submitter

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					regarding the policy imposing costs and impacts on them developing their ancestral lands; amendment will ensure the purpose of the RMA achieved, including s.6 matters
S286 - Taranaki Whānui	S286.077	Support	Allow	Delete Rule WH.R13	Request is consistent with GTC submission; represents good planning practice; and addresses issue raised by submitter regarding the policy imposing costs and impacts on them developing their ancestral lands; amendment will ensure the purpose of the RMA achieved, including s.6 matters
S286 - Taranaki Whānui	S286.088	Support	Allow	Delete clause (b) of Rule WH.R24 regarding the earthworks winter shut down period	Request is consistent with GTC submission; represents good planning practice as the submitter identifies the possibility of this clause can escalate the activity to a non-complying activity
S18 - PF Olsen Ltd	S18.002	Support in part	Allow in part	Exclude forestry from earthworks rules	Request is consistent with GTC submission that seeks the NRP to rely on the requirements of the NES-CF to address water quality affects associated with commercial forestry which are considered appropriate; more rigorous requirements in the NRP are not considered necessary to implement the NPS-FM or to achieve the purpose of the RMA
S18 - PF Olsen Ltd	S18.022	Support	Allow	Amend Policy WH.P2 to exclude forestry activities from management to achieve target attribute states	Request is consistent with GTC submission that seeks the NRP to rely on the requirements of the NES-CF to address water quality affects associated with commercial forestry which are considered appropriate; more rigorous requirements in the NRP are not considered necessary to implement the NPS-FM or to achieve the purpose of the RMA
S18 - PF Olsen Ltd	S18.032	Support	Allow	Amend Rule WH.R17 to default to the NES-CF standards for vegetation clearance associated with commercial forestry	Request is consistent with GTC submission that seeks the NRP to rely on the requirements of the NES-CF to address water quality affects associated with commercial forestry which are considered appropriate; more rigorous requirements in the NRP are not considered necessary to implement the NPS-FM or to achieve the purpose of the RMA
S18 - PF Olsen Ltd	S18.037	Support	Allow	Amend Rule WH.R23 to default to the NES-CF standards for earthworks associated with commercial forestry	Request is consistent with GTC submission that seeks the NRP to rely on the requirements of the NES-CF to address water quality affects associated with commercial forestry which are considered appropriate; more rigorous requirements in the NRP are not considered necessary to

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.023	Oppose in part	Disallow in part	Retain the wording of Objective WH.O2 as notified, subject to the amendment sought by GTC in their original submission	The need to add a reference to 'ephemeral watercourses' and 'natural form and character' is opposed as including these waterbodies in the objective is unnecessary and impractical and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.032	Oppose	Disallow	Retain wording of Objective WH.O9 as notified	The need for the additional wording 'natural form and character' is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.034	Oppose	Disallow	Retain the wording of Policy WH.P1 (b) as notified, subject to the amendment sought by GTC in their original submission	The need for the additional wording 'natural form and character' and the requirement to restore natural form and character is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.035	Oppose	Disallow	Either delete clause (f) of Policy WH.P2 or amend as requested by GTC in their original submission	The need to avoid (and not manage) adverse effects from earthworks, forestry and vegetation clearance activities is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.048	Oppose	Disallow	Retain the wording of Policy WH.P28 as notified, subject to the amendment sought by GTC in their original submission	The need to require setbacks, alternative harvesting methods and/or limit harvesting is not necessary in the NRP as the requirements of the NES-CF should take precedence and the additional wording is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.049	Oppose	Disallow	Retain the wording of Policy WH.P29 as notified	The need to require setback distances is not required in the NRP as the NES-FM and NES-CF already addresses this matter
S222 - Environmental Defence Society Inc.	S222.060	Oppose in part	Disallow in part	Retain controlled activity status of Rule WH.R20 as notified, subject to amendment sought by GTC in their original submission	If the rule remains, the need to reclassify the activity status to discretionary or restricted discretionary is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.063	Oppose in part	Disallow in part	Retain the wording of Rule WH.R23 as notified	The greater setback sought by the submitter is already addressed in the NES-FM and the NES-CF and is not required in the NRP and are not necessary to implement the NPS-FM or to achieve the purpose of the RMA

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
S222 - Environmental Defence Society Inc.	S222.064	Oppose in part	Disallow in part	Retain restricted discretionary activity status of Rule WH.R24 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of discretion are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S37 - Donald Skerman	S37.001	Oppose	Disallow	Delete the prohibition of unplanned greenfield development as per GTC's original submission and financial contributions requirement as supported by submitters seeking this outcome in this further submission	The request to retain the prohibition of unplanned greenfield development and the mandatory financial fees is unnecessary and onerous, is not good planning practice and would not implement the NPS-UD or achieve the purpose of the RMA
S37 - Donald Skerman	S37.003	Oppose	Disallow	Delete the 'unplanned greenfield area' covering the Southern Growth Area from Map 88 as requested in GTC's original submission	The request to retain the submitter's land known as the Southern Growth Area does not represent good planning practice and fails to appropriately implement the requirements of the NPS-UD and achieve the purpose of the RMA
S37 - Donald Skerman	S37.004	Oppose	Disallow	Retain the paper road extending from Kiln St as shown on Planning Map 88	The request is not a regional plan matter and is unnecessary and inappropriate for the Council to consider as part of PC1
S216 - Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.006	Support	Allow	Change Rule WH.R13 from prohibited to non-complying	The request is consistent with GTC's original submission and represents good planning practice and would implement the NPS-UD and achieve the purpose of the RMA
S282 - Pat van Berkel	S282.014	Oppose	Disallow	Retain the wording of Policy WH.P10 as notified	The request is unnecessary and inappropriate, does not represent good planning practice and would not implement the NPS-UD or achieve the purpose of the RMA
S282 - Pat van Berkel	S282.021	Oppose	Disallow	Delete the 'unplanned greenfield area' covering the Southern Growth Area from Map 88 as requested in GTC's original submission	The request to retain the submitter's land known as the Southern Growth Area does not represent good planning practice and fails to appropriately implement the requirements of the NPS-UD and achieve the purpose of the RMA
S110 - Save Our Hills (Upper Hutt) Incorporated	S110.001	Oppose	Disallow	Either delete Policy WH.P16 or amend to provide for stormwater discharges from unplanned greenfield development as sought in GTC's original submission	The request not to allow any new stormwater discharges from the Southern Growth Area (being GTC's land) is unnecessary and inappropriate, does not represent good planning practice and would not implement the NPS-UD or achieve the purpose of the RMA
S195 - New Zealand Farm Forestry Association (NZFFA)	S195.005	Support	Allow	Remove regulating of replanting of plantation (commercial) forests	The request represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and controls on replanting are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA

<b>Original Submitter Name, and Number</b>	<b>Submission point Number</b>	<b>Stance*</b>	<b>Decision Sought *</b>	<b>Decision Sought</b> "The decision I would like the Council to make on this submission point is..."	<b>Reason for feedback:</b>
S195 - New Zealand Farm Forestry Association (NZFFA)	S195.029	Support	Allow	Remove rules more stringent than the NES-CF	The request represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and more stringent are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA
S195 - New Zealand Farm Forestry Association (NZFFA)	S195.041	Support in part	Allow in part	Remove afforestation from Rule WH.R20	Should the rule be retained and not deleted as requested by the GTC in their submission, the amendment requested represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and controls on afforestation are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA
S195 - New Zealand Farm Forestry Association (NZFFA)	S195.030	Support	Allow	Remove rules more stringent than the NES-CF	The request represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and more stringent are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA
S195 - New Zealand Farm Forestry Association (NZFFA)	S195.031	Support	Allow	Remove rules more stringent than the NES-CF	The request represents good planning practice as the NES-CF addresses effects of plantation (commercial) forestry and more stringent are not needed in the NRP to implement the NPS-FM and to achieve the purpose of the RMA
S256 - Waste Management NZ Limited	S256.006	Oppose	Disallow	Delete definition of unplanned greenfield development as sought in GTC's original submission	The request to amend the current definition of unplanned greenfield development is unnecessary and inappropriate and does not represent good planning practice and would not implement the NPS-UD or achieve the purpose of the RMA
S2 - Horokiwi Quarries Ltd	S2.001	Support in part	Allow in part	Include definition of 'greenfield development'	Request represents good planning practice and will assist with the implementation of the NRP
S2 - Horokiwi Quarries Ltd	S2.031	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S161 - GILLIES GROUP MANAGEMENT LTD	S161.021	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S161 - GILLIES GROUP	S161.041	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate



Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
MANAGEMENT LTD					way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S165 - PUKERUA HOLDINGS LIMITED	S165.021	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S165 - PUKERUA HOLDINGS LIMITED	S165.041	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S173 - ARAKURA PLAINS DEVELOPMENT LIMITED	S173.021	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S173 - ARAKURA PLAINS DEVELOPMENT LIMITED	S173.041	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S207 - Firth Industries Limited	S207.018	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S236 - Parkvale Road Limited	S236.009	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S236 - Parkvale Road Limited	S236.011	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S251 - Peka Peka Farm Limited	S251.008	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S251 - Peka Peka Farm Limited	S236.015	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S43 - Fulton Hogan Ltd	S43.013	Oppose	Disallow	Delete Policy WH.P31 in its entirety, as sought by GTC in their submission	The additional provisions sought to Policy WH.P31 regarding the winter shut down period are unnecessary and

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA
S43 - Fulton Hogan Ltd	S43.017	Oppose	Disallow	Delete clause (b) from Rule WH.R24 regarding the earthworks winter shut down period	The additional provisions sought to Clause (b) regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA
S190 - David McKeivitt	S190.002	Oppose	Disallow	Delete Policy WH.P31 in its entirety, as sought by GTC in their submission	The additional provisions sought to Policy WH.P31 regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA
S190 - David McKeivitt	S190.004	Oppose	Disallow	Delete clause (b) from Rule WH.R24 regarding the earthworks winter shut down period	The additional provisions sought to Clause (b) regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA
S219 - Cuttriss Consultants Ltd	S219.001	Oppose in part	Disallow in part	Include a new definition of 'greenfield development' but not with the restrictive criteria included in the definition proposed by the submitter	While the request to include a new definition of 'greenfield development' is appropriate and necessary and supported, however, the area and lot restrictions proposed by the submitter are opposed as they are not necessary to be included in a definition to describe what a greenfield development is
S219 - Cuttriss Consultants Ltd	S219.006	Oppose in part	Disallow in part	Retain the definition of hydrological control as notified, subject to the amendment sought by GTC in it's original submission	The additional wording sought by the submitter is overly detailed and technical and not necessary or appropriate to be included in a definition in the NRP
S243 - Land Matters Limited	S243.001	Support	Allow	Include definition of 'greenfield development'	Request represents good planning practice and will assist with the implementation of the NRP
S243 - Land Matters Limited	S243.032	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S241 - Pukerua Property Group Ltd	S241.038	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S247 - Carrus Corporation Ltd	S247.001	Oppose in part	Disallow in part	Include a new definition of 'greenfield development' but not with the restrictive criteria included in the definition proposed by the submitter	While the request to include a new definition of 'greenfield development' is appropriate and necessary and supported, however, the area and lot restrictions proposed by the

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					submitter are opposed as they are not necessary to be included in a definition to describe what a greenfield development is
S252 - Thames Pacific	S252.001	Oppose in part	Disallow in part	Include a new definition of 'greenfield development' but not with the restrictive criteria included in the definition proposed by the submitter	While the request to include a new definition of 'greenfield development' is appropriate and necessary and supported, however, the area and lot restrictions proposed by the submitter are opposed as they are not necessary to be included in a definition to describe what a greenfield development is

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	Chris@rmaexpert.co.nz
Phone: (Optional)	

Contact person for submission: (If different to above)	Chris Hansen
I wish to be heard in support of my submission at a hearing:	Yes
I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	Yes
Specify the reasoning behind why you qualify for either of these above options:	Submitters are addressing the need for housing in the Hutt Valley; submitters own land affected by PC1; submitters operate a commercial forest that is affected by PC1

<b>3. For the further submitter to action</b>
Service of your further submission: Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a> . If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

<b>4. Disclosures:</b>	
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	15 March 2024
<b>Public information:</b> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a> . You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a> .	

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following</li> </ul>

format:

Suggested added text, shown as **bolded text** format

Suggested deleted text, shown as ~~striketrough~~ format

**Please enter further submission points in the table on the following page(s)**

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<p><b>*Submitter name or, Submitter number of the submission you are commenting on:</b></p>	<p><b>*Submission point number:</b> <i>Unique identifying number allocated to each specific <u>submission point</u>, located in the second column of the summary of decisions requested table:</i></p>	<p><b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i></p>	<p><b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i></p>	<p><b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
S288 China Forest Group Company New Zealand Limited	S288.001 – General comments - overall	Support in part	Allow in part	Align rules relating to forestry with requirements of the NES-CF	Submission is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF
S288 China Forest Group Company New Zealand Limited	S288.023 – Definition - Erosion and sediment management plan	Support	Allow	Use NES-CF schedule 4 & 5 for erosion and sediment plans relating to commercial forestry	Submission is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF
S288 China Forest Group Company New Zealand Limited	S288.056 – Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry	Support in part	Allow in part	Remove policy and reset to address deficiencies as requested by submitter	Submission is consistent with GTC's own submission and the concern regarding Policy WH.P28
S288 China Forest Group Company New Zealand Limited	S288.057 – Policy WH.P29: Management of earthworks	Support	Allow	Amend policy as requested by submitter and include a new	Request for clarification that the policy relates to general earthworks and not commercial

				policy covering commercial forestry earthworks consistent with the NES-CF	forestry and the request for a new policy covering commercial forestry is appropriate to implement the objectives of the NRP and represents good planning practice
S288 China Forest Group Company New Zealand Limited	S288.066 – Rule WH.R17 – Vegetation clearance on highest erosion risk land – permitted activity	Support	Allow	Separate vegetation clearance associated with commercial forestry activities from general vegetation clearance and rely on NES-CF	The submitter makes a good point being the need to separate vegetation clearance associated with commercial forestry that is already addressed by the NES-CF – this request is consistent with GTC’s own submission seeking the provisions of the NES-CF to be relied on
S288 China Forest Group Company New Zealand Limited	S288.067 – Rule WH.R18 – Vegetation clearance on highest erosion risk land – controlled activity	Support	Allow	Separate vegetation clearance associated with commercial forestry activities from general vegetation clearance and rely on NES-CF	The submitter makes a good point being the need to separate vegetation clearance associated with commercial forestry that is already addressed by the NES-CF – this request is consistent with GTC’s own submission seeking the provisions of the NES-CF to be relied on
S288 China Forest Group Company New Zealand Limited	S288.068 – Rule WH.R19 – Vegetation clearance – discretionary activity	Support	Allow	Separate vegetation clearance associated with commercial forestry activities from general vegetation clearance and rely on NES-CF	The submitter makes a good point being the need to separate vegetation clearance associated with commercial forestry that is already addressed by the NES-CF – this request is consistent with GTC’s own submission seeking the provisions of the NES-CF to be relied on
S288 China Forest Group Company New Zealand Limited	S288.069 – Rule WH.R20 – Plantation forestry – controlled activity	Support in part	Allow in part	Delete rule and rely on provisions of NES-CF	The request is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry



					being onerous and not consistent with the requirements of the NES-CF
S288 China Forest Group Company New Zealand Limited	S288.070 – Rule WH.R21 – Plantation forestry – discretionary activity	Support in part	Allow in part	Delete rule and rely on provisions of NES-CF	The request is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF
S288 China Forest Group Company New Zealand Limited	S288.071 – Rule WH.R21 – Plantation forestry on highest erosion risk land – discretionary activity	Support	Allow	Delete rule and rely on provisions of NES-CF	The request is consistent with GTC's own submission and the concern regarding the level of control on commercial forestry being onerous and not consistent with the requirements of the NES-CF
S288 China Forest Group Company New Zealand Limited	S288.072 – Rule WH.R23 – Earthworks – permitted activity	Support in part	Allow in part	Align earthworks associated with commercial forestry activities with the provisions of the NES-CF	The submitter makes a good point being the need to align earthworks associated with commercial forestry with the requirements of the NES-CF – this request is consistent with GTC's own submission seeking the provisions of the NES-CF to be relied on
S288 China Forest Group Company New Zealand Limited	S288.073 – Rule WH.R24 – Earthworks – restricted discretionary activity	Support in part	Allow in part	Separate earthworks associated with commercial forestry activities from general earthworks and rely on NES-CF	The submitter makes a good point being the need to separate earthworks associated with commercial forestry that is already addressed by the NES-CF – this request is consistent with GTC's own submission seeking the provisions of the NES-CF to be relied on

S37 - Donald Skerman	Map 88: Unplanned greenfield areas – Upper Hutt City Council	Oppose	Disallow	All GTC land on Map 88 to be categorized as 'Planned/existing urban area'	The request to remove GTC from the 'Planned/existing urban area' is opposed as it would not provide for the implementation of the NPS-UD, the objectives of the RPS, and the requirement to meet the housing needs of Upper Hutt City. The request is contrary to GTC's own submission to seeking all of its land to be included as 'Planned/existing urban area' (submission Point #2)
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Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Filter original submission point by the chapter location	Filter original submission point by specific provision title	Filter by the original submitter Name and associated Submitter Number	Unique identifying number allocated to each specific submission point	Support Oppose Support in part Oppose in part Not stated	Allow Disallow Allow in part Disallow in part	<p>Illustrate which aspects of this original submission that you support or oppose.</p> <p>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</p>	Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
General comments	General comments - consultation	Wellington Fish and Game Regional Council, S188	S188.016	Support	Allow	HortNZ supports the assertion that Greater Wellington Regional Council has an obligation to follow Section 3.2(2)(b) of the NPSFM 2020, which requires every regional council to engage with communities and tangata whenua to identify long-term visions, environmental outcomes, and other elements of the NOF.	A clear engagement process is needed to achieve the requirements of the NPSFM 2020.
General comments	General comments - current legislation	Upper Hutt City Council, S225	S225.006	Support	Allow	HortNZ supports the need to amend PC1 to correctly implement national planning standards, including the NPS-HPL.	GWRC has an obligation to implement the National Policy Statement for Highly Productive Land (NPS-HPL) as soon as practicable. PC1 to the NRP was notified October 2023, well after the NPS-HPL (October 2022). Clause 3.2 (1) (a) of the NPS-HPL requires regional councils to consider "how land-based primary production, including supporting activities, interact with freshwater management at a catchment level".

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
General comments	General comments - fresh water	Wairarapa Federated Farmers, S193	S193.018	Support	Allow in part	Make any consequential amendment(s) necessary to give effect to the relief sought.	HortNZ supports the assertion that the involvement of communities, stakeholders and territorial authorities is important in the development of FAPs, in addition to partnership with mana whenua/tangata whenua, and this is recognised in the NPS-FM.
General comment	General comments - overall	Forest & Bird, S261	S261.008	Oppose	Disallow	Disallow.	HortNZ believes that it is appropriate for GWRC to approve a "recognised nitrogen risk assessment tool" outside of a Schedule 1 process, although we would support criteria for the tool being in the plan.
General comment	General comments - overall	Forest & Bird, S261	S261.010	Oppose	Disallow	Disallow. Do not amend to change permitted activity status for farming activities with a farm plan.	HortNZ contends that a permitted activity status for farming or horticulture with a farm plan is appropriate, particularly to give regard to the NPS-HPL and prioritise land-based primary production, including supporting activities, on highly productive land.
General comment	General comments - rural	Wairarapa Federated Farmers, S193	S193.019	Support in part	Allow in part	Replace use of the term "farm environment plan" or FEP throughout the plan with "freshwater farm plan" or FWFP for consistency and to avoid multiple plans being required for a single property. Amend the timing for the nationally mandated FWFPs to be as determined in the national roll-out timeline.	HortNZ supports the use of FWFPs to identify and manage on-farm risk to freshwater contamination in line with national direction.

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
General comment	General comments - water bodies	Forest & Bird, S261	S261.004	Support in part	Allow in part	Identify the values for each FMU, including a value for Irrigation, cultivation, and production of food and beverages as required by the NPSFM 2020.	Values should be clearly identified for each FMU.
2 Interpretation	Earthworks	Upper Hutt City Council, S225	S225.032	Support	Allow	Reintroduce the exclusions for "the harvesting of crops" and "maintenance of orchards and shelterbelts".	It is unreasonable to remove exclusions for business-as-usual horticultural activities.
2 Interpretation	Earthworks	Wairarapa Federated Farmers, S193	S193.021	Support	Allow	Retain operative definition for all whitua or otherwise reintroduce the exclusions for "the harvesting of crops" and "maintenance of orchards and shelterbelts".	It is more effective and efficient plan drafting to have the same definition across all whitua.
2 Interpretation	Recognised Nitrogen Risk Assessment Tool	Forest & Bird, S261	S261.020	Oppose	Disallow	Disallow.	HortNZ believes that it is appropriate for GWRC to approve a "recognised nitrogen risk assessment tool" outside of a Schedule 1 process, although we support inclusion of criteria for the tool in the plan. New tools may be developed, so flexibility is needed to leave room for innovation.
3 Objectives	Objective O2	Wairarapa Federated Farmers, S193	S193.029	Support	Allow	Allow. Retain Objective O2 for all whitua.	Objective O2 is relevant to all whitua and should be retained.
3 Objectives	Objective O5	Wellington Water Ltd, S151	S151.032	Support	Allow	Allow. Retain Objective O5 for all whitua.	Objective O5 is relevant to all whitua and should be retained.
3 Objectives	Objective O6	Wairarapa Federated Farmers, S193	S193.031	Support	Allow	Allow. Retain Objective O6 for all whitua.	Objective O6 is relevant to all whitua and should be retained.

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
4 Policies	Policy P70: Minimising effects of rural land use activities.	Wairarapa Federated Farmers, S193	S193.033	Support	Allow	Allow. Retain Policy 70 for all whitua.	Policy P70 is relevant to all whitua and should be retained.
4 Policies	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Wairarapa Federated Farmers, S193	S193.035	Support	Allow	Allow. Retain Policy 74 for all whitua.	Policy P74 is relevant to all whitua and should be retained.
4 Policies	Policy P118: Water takes at minimum flows and minimum water levels.	Wairarapa Federated Farmers, S193	S193.036	Support	Allow	Allow. Retain Policy 118 for all whitua, particularly (d) (iii).	Policy P118 is relevant to all whitua and should be retained. In particular, (d) (iii) is essential to provide for rootstock survival water.
5.1 Air quality rules	Rule R35: Water and wastewater processes - permitted activity.	Wellington Water Ltd, S151	S151.046	Oppose	Disallow	Retain reference to "water". Do not amend to "drinking water processes".	This rule does not need to be more specific.
5.1 Air quality rules	5.1.14 Discharge of agrichemicals	New Zealand Agrichemical Education Trust (NZAET), S227	S227.004	Support	Allow	Allow replacement of 5.1.13 (e) with "the discharge shall be undertaken in accordance with the good practice requirements set out in NZS 8409:2021 Section 5.2.".	This is an appropriate amendment.

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5.1 Air quality rules	5.1.14 Discharge of agrichemicals	New Zealand Agrichemical Education Trust (NZAET), S227	S227.001	Support	Allow	Allow. Delete "(d) the <b>agrchemical</b> is approved by the Environmental Protection Agency"	Non-hazardous substances are already regulated under the HSNO Act and EPA and do not require further regional rules.
5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks - permitted activity.	Wairarapa Federated Farmers, S193	S193.039	Support	Allow	Allow. Retain Rule R101 for all whitua.	Rule R101 is relevant to all whitua and should be retained.
5.2 and 5.3 Discharges to land and water and land use rules	Rule R102: Construction of a new farm track - permitted activity.	Wairarapa Federated Farmers, S193	S193.040	Support	Allow	Allow. Retain Rule R102 for all whitua.	Rule R102 is relevant to all whitua and should be retained.
5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track - controlled activity.	Wairarapa Federated Farmers, S193	S193.041	Support	Allow	Allow. Retain Rule R103 for all whitua.	Rule R103 is relevant to all whitua and should be retained.
6 Other methods	Method M36: Freshwater Action Plan programme.	Wairarapa Federated Farmers, S193	S176.004	Support in part	Allow in part	Amend Method 36 (a) as follows:  developed in partnership with mana whenua, and <del>be informed by</del> <b>through</b> engagement with <del>catchment</del> communities, territorial authorities and stakeholders...	This amendment allows for closer alignment with Section 3.15 of the NPS-FM.
6 Other methods	Method M42: Small farm property registration within Whitua Te	Upper Hutt City Council, S225	S225.055	Support	Allow in part	Delete this method.	This is an onerous requirement for small properties.

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	Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.						
6 Other methods	Method M44: Supporting the health of rural waterbodies.	Wairarapa Federated Farmers, S193	S193.054	Support	Allow in part	Make any consequential amendment(s) necessary to give effect to the relief sought. Direct Council assistance with appropriate on-farm mitigations for 100% of farms in rural catchments by x date, eg, 2030. Also direct Council to invest in catchment-scale mitigation options.	An integrated management approach is needed to target mitigations to make the specific improvements needed based on the state of the overall catchment.
8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Wairarapa Federated Farmers, S193	S193.056	Support	Allow in part	Amend WH.O1 to add the following clause, " <b>Primary production activities thrive with water quality and quantity suitable for irrigation needs.</b> "	Amend to provide for the value for Irrigation, cultivation, and production of food and beverages in the NPS-FM.



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8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Tama Potaka, Minister of Conservation, S245	S245.001	Support	Allow	Allow, amend bullet point two from: "All freshwater bodies have planted margins" to " <b>All freshwater bodies have vegetated margins where practicable.</b> "	This objective will be more achievable with the submitter's amendment.
8 Whaitua Te Whanganui-a-Tara	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	Wairarapa Federated Farmers, S193	S193.057	Support in part	Allow in part	Amend (a) water quality, habitats, water quantity and ecological processes are at a level where the state of aquatic life is maintained, or meaningful progress has been made towards improvement where <b>below the target attribute state</b> degraded, and... Add clause (i) to provide for reliable water to support a thriving primary production sector.	Water bodies above the national bottom lines could be deemed by the community to be sufficiently healthy to meet the requirements of the NPSFM given the other hierarchies of obligation under Te Mana o te Wai.
8 Whaitua Te Whanganui-a-Tara	Table 8.1: Coastal water objectives	Wairarapa Federated Farmers, S193	S193.059	Support	Allow	Add column for measured baseline state. Amend units for muddiness. Amend unit for	Amend to be consistent with the NPS-FM.

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						Sedimentation rate to Current:Baseline.	The units for muddiness are unclear, and sedimentation rate should have the unit Current: Baseline.
8 Whaitua Te Whanganui-a-Tara	Objective WH.O5 By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	Wairarapa Federated Farmers, S193	S193.061	Support in part	Allow in part	Amend WH.O5 as follows: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards a <b>natural reference state wai ora</b> , such that: (a) water quality, habitats, water quantity and ecological processes are at a level where the state of aquatic life is maintained, or meaningfully improved where <b>below the target attribute state degraded</b> , to achieve the target attribute states in Table 8.2, and...	We question whether wai ora is only achieved by the A band when the lakes are already above the national bottom lines and therefore could be deemed by the community to be sufficiently healthy to meet the requirements of the NPSFM given the other hierarchies of obligation under Te Mana o te Wai.

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8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Wairarapa Federated Farmers, S193	S193.063	Support	Allow in part	Amend WH.O6 (d) as follows, "ensure that groundwater is of sufficient quality <b>and reliability</b> for <b>irrigation and</b> human and stock drinking water, and..."	Water quality is also important for irrigation of fruits and vegetables to meet food safety standards.
8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Forest & Bird, S261	S261.060	Oppose	Disallow in part	Disallow amendment to WH.O9 and associated table. Amend WH.O9 as follows: (a) where a target attribute state in Table 8.4 is not met, the state of that attribute is improved in <del>all rivers and river reaches</del> in the part Freshwater Management Unit	It is unclear whether those areas not in natural bush can realistically meet a natural state.
8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers	Wellington Water Ltd, S151	S151.064	Support in part	Allow in part	Either leave TAS at A and make change to WH.O9 to remove requirement for every river and every reach or make TAS achievable given activities that occur near every river and every reach. This applies to each catchment.  Provide further information on the baseline state and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis.	For Ōrongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa Kairangi forested mainstems, it is not clear whether A band can be achieved for macroinvertebrates and sediment if there is plantation forestry in that catchment. This line of reasoning applies to each river catchment where improvement are sought which are greater than maintaining the baseline state.

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8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Forest & Bird, S261	S261.063	Oppose	Disallow	Disallow. Amend (a) as follows: prohibiting unplanned <b>urban</b> greenfield development and for other <b>urban</b> greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and	Prohibiting land use intensification may inadvertently prohibit vegetable crop rotation, in which land use rotates through pastoral and vegetable cropping phases for soil health and biosecurity management. Prohibiting changes in land use from pastoral to horticulture would be an adverse outcome for regional food security and emissions reduction.
8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	PF Olsen Ltd, S18	S18.023	Support	Allow	Allow, amend as follows: "The Wellington Regional Council shall, in partnership with mana whenua, <b>the local community and primary industry</b> , prepare and deliver Freshwater Action Plans..."	Comprehensive and representative decision-making requires partnership with mana whenua, the local community and primary industry.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P7: Discharges to groundwater.	Upper Hutt City Council, S225	S225.072	Support	Allow	Allow. Amend to clarify which discharges this policy attempts to manage.	HortNZ shares concerns that this policy is not specific about which discharges are addressed.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Wairarapa Federated Farmers, S193	S193.079	Support	Allow	Amend WH.P15 as follows: ...new <b>urban</b> greenfield development...	Amend for clarity
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P16: Stormwater discharges from new	Wairarapa Federated Farmers, S193	S193.080	Support	Allow	Amend WH.P16 as follows: Avoid all new stormwater discharges from <b>urban</b> unplanned greenfield development...	Amend for clarity

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	unplanned greenfield development.						
8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Upper Hutt City Council, S225	S225.083	Support	Allow in part	Amend WH.P21 (a) as follows, " <del>capping</del> , minimising and reducing diffuse discharges from individual rural properties in accordance with WH.P22, WH.P23 and WH.P24..." Delete WH.P21 (a).	The method of capping nitrogen discharges from individual properties is not supported. Capping discharges on every property is not a targeted approach and may adversely affect local fruit and vegetable production, which is of great importance to the local community and beneficial for regional food security.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Taranaki Whānui, S286	S286.052	Support	Allow	Delete WH.P21 (a).	HortNZ supports integrated catchment management, where mitigations are targeted to the most effective places to reduce the worst contaminants, not a blanket approach to capping discharges.
8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Environmental Defence Society Inc., S222	S222.043	Oppose	Disallow	Disallow.	The Resource Management (Freshwater Farm Plans) Regulations 2023 only require freshwater farm plans for horticultural land use on 5 ha or more of land. Requiring farm environment plans for smaller properties would be out of step with national direction.

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8 Whaitua Te Whangan ui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Forest & Bird, S261	S261.083	Oppose in part	Disallow	Do not amend to require reductions in discharges from smaller land parcels.	HortNZ agrees that the effects of cumulative discharges should be evaluated at the FMU or sub-catchment scale. The answer is not to restrict individual smaller, non-intensive horticultural land uses but instead to determine targeted mitigations based on catchment-wide contaminants.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Wairarapa Federated Farmers, S193	S193.084	Support	Allow	Allow. Delete WH.P24.	Timelines for farm plans are already managed by national regulation.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P25: Managing rural land use change.	Upper Hutt City Council, S225	S225.087	Support	Allow	Delete this policy and associated provisions.	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P25: Managing rural land use change.	PF Olsen Ltd, S18	S18.027	Support	Allow	Delete provision. Review any remaining policies related to rural land use change with the considerations listed by the submitter.	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P29: Management of earthworks.	Forest & Bird, S261	S261.090	Oppose	Disallow	Disallow.	Setbacks are managed through district plans.

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8 Whaitua Te Whangan ui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Hutt City Council, S211	S211.017	Support	Allow	Delete policy or amend Policy WH.P31 to exclude ancillary rural earthworks and introduce the following definition for ancillary rural earthworks: "Earthworks associated with normal agricultural and horticultural practices, such as: <ul style="list-style-type: none"> <li>• Maintenance and construction of facilities, devices and structures typically associated with farming activities including but not limited to farm tracks, driveways and unsealed parking areas, stock races, silage pits, farm drains, farm effluent ponds, and feeding lots, fencing, crop protection and sediment control measures</li> <li>• Irrigation and land drainage</li> <li>• The burying of material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993."</li> </ul>	Winter shutdown of ancillary rural earthworks would shut down normal agricultural and horticultural practice. Exclude these activities directly or delete the policy.

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8 Whaitua Te Whangan ui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Forest & Bird, S261	S261.110	Oppose	Disallow	Do not introduce additional standards. Amend Rule WH.R17 (a) as follows: (a) (ii) for the control of pest plants, and or <b>(iii) to remove material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993, and</b>	Setbacks are managed through district plans. Pest plants may need to be removed for biosecurity purposes.
8 Whaitua Te Whangan ui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Greater Wellington Regional Council, S238	S238.018	Support	Allow	Delete (a) and (b) such that Rule WH.R23 applies to all earthworks, including ancillary rural earthworks.	Ancillary rural earthworks should be a permitted activity.
8 Whaitua Te Whangan ui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Greater Wellington Regional Council, S238	S238.019	Support in part	Allow in part	Amend Rule WH.R26 as follows: "Farming activities on a <del>property of</del> between 4 and 20 hectares of land - permitted activity The use of land on a <del>property</del> of 4 hectares or more and less than 20 hectares for..."	Rules should relate to the effective area used rather than parcel size.



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8 Whaitua Te Whangan ui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Greater Wellington Regional Council, S238	S238.020	Oppose	Disallow	<p>Disallow. Amend as follows: a farm environment plan in respect of the land and associated land use is supplied to <b>a farm environment plan certifier Wellington Regional Council by within 18 months after</b> the date set out in Table 8.6 for the part Freshwater Management Unit in which the farm is located, and...</p> <p>(c) a farm environment plan certifier certifies in writing that:</p> <p>(i) the farm environment plan supplied to the Wellington Regional Council has been prepared in accordance with, and meets the requirements of Schedule Z (farm environmentplan) and <b>the Resource Management (Freshwater Farm Plans) Regulations 2023, Schedule 36</b> (farm environment plan= additional);</p> <p>or</p> <p>(ii) where the farm environment plan is certified under section 217G of Part 9A of the RMA, that the farm environment plan meets the requirements of condition (b), and...</p>	The Resource Management (Freshwater Farm Plans) Regulations 2023 call for an 18-month transition period from when freshwater farm plans are phased in for the region to when they must be submitted to a certifier. It is then the obligation of the certifier to send the certification to the council.

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8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Terawhiti Farming Co Ltd, S224	S224.015	Support	Allow	Allow.	This farm plan requirement should not create any duplication with Freshwater Farm Plans.
Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Forest & Bird, S261	S261.125	Oppose	Disallow	Disallow.	This rule will make crop rotation near impossible, an essential practice for soil health and managing pests and diseases. Making the rule more restrictive will essentially prohibit crop rotation and land use change to horticulture, a low emissions land use.
8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Wairarapa Federated Farmers, S193	S193.109	Support	Allow	Delete WH.R31.	This rule as notified would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure.
8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a-Tara - restricted discretionary activity.	Wairarapa Federated Farmers, S193	S193.111	Oppose	Disallow	Retain restricted discretionary activity status and retain matter of discretion 1. The reasonable and efficient use of water.	HortNZ supports restricted discretionary activity status to retain efficient use as a matter of discretion.

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
8 Whaitua Te Whanganui-a-Tara	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	Wairarapa Federated Farmers, S193	S193.112	Support	Allow in part	Amend P.O1 to add the following clause, " <b>Primary production activities thrive with water quality and quantity suitable for irrigation needs.</b> "	Amend to provide for the value for Irrigation, cultivation, and production of food and beverages in the NPS-FM.
9 Te Awarua-o-Porirua Whaitua	Table 9.1: Coastal water objectives.	Wairarapa Federated Farmers, S193	S193.115	Support	Allow	Add column showing baseline state.	Numeric baselines are needed to introduce targets.
9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Forest & Bird, S261	S261.060	Oppose	Disallow in part	Disallow amendment to P.O6 and associated table. Amend P.O6 as follows: (a) where a target attribute state in Table 9.2 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit...	It is unclear whether those areas not in natural bush can realistically meet a natural state.

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
9 Te Awarua-o-Porirua Whaitua	Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives.	Forest & Bird, S261	S261.142	Oppose	Disallow	Disallow Amend (a) as follows: prohibiting unplanned <b>urban</b> greenfield development and for other <b>urban</b> greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and	Prohibiting land use intensification may inadvertently prohibit vegetable crop rotation, in which land use rotates through pastoral and vegetable cropping phases for soil health and biosecurity management. Prohibiting changes in land use from pastoral to horticulture would be an adverse outcome for regional food security and emissions reduction.
9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	PF Olsen Ltd, S18	S18.047	Support	Allow	Allow, amend as follows: "The Wellington Regional Council shall, in partnership with mana whenua, <b>the local community and primary industry</b> , prepare and deliver Freshwater Action Plans..."	Comprehensive and representative decision-making requires partnership with mana whenua, the local community and primary industry.
9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Winstone Aggregates, S206	S206.066	Support	Allow	Allow proposed amendment and clarify which discharges this policy attempts to manage.	HortNZ shares concerns that this policy is not clear or measurable.
9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Porirua City Council, S240	S240.051	Support	Allow in part	Delete Policy P.P20 or Amend WH.P21 (a) as follows, " <del>capping</del> , minimising and reducing diffuse discharges <del>from individual rural properties</del> in accordance with WH.P22, WH.P23 and WH.P24..."	The method of capping nitrogen discharges from individual properties is not supported. Capping discharges on every property is not a targeted approach and may adversely affect local fruit and vegetable production, which is of great importance to the local community and beneficial for regional food security. HortNZ agrees that this policy unnecessarily cross references other policies.

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Willowbank Trustee Limited, S204	S204.005	Support	Allow	Allow, amend Policy P.P21(c)(ii) by deleting words " <del>and by the phasing out of any poor management practices</del> "	It is unclear what is meant by poor management practices in contrast to good management practices, which are defined in the plan.
9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities	Environmental Defence Society Inc., S222	S222.087	Oppose	Disallow	Disallow	The Resource Management (Freshwater Farm Plans) Regulations 2023 only require freshwater farm plans for horticultural land use on 5 ha or more of land. Requiring farm environment plans for smaller properties would be out of step with national direction.
9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities	Forest & Bird, S261	S261.163	Oppose in part	Disallow	Do not amend to require reductions in discharges from smaller land parcels.	HortNZ agrees that the effects of cumulative discharges should be evaluated at the FMU or sub-catchment scale. The answer is not to restrict individual smaller, non-intensive horticultural land uses but instead to determine targeted mitigations based on catchment-wide contaminants.
9 Te Awarua-o-Porirua Whaitua	Policy P.P23: Phasing of farm environment plans.	Wairarapa Federated Farmers, S193	S193.134	Support	Allow	Allow. Delete P.P23.	Timelines for farm plans are already managed by national regulation.
9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	PF Olsen Ltd, S18	S18.053	Support	Allow	Delete provision. Review any remaining policies related to rural land use change with the considerations listed by the submitter.	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Wairarapa Federated Farmers, S193	S193.135	Support	Allow	Delete Policy P.P24.	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.
9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Forest & Bird, S261	S261.169	Oppose	Disallow	Disallow.	Setbacks are managed through district plans.
9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Porirua City Council, S240	S240.060	Support	Allow in part	Delete policy or amend Policy WH.P31 to exclude ancillary rural earthworks and introduce the following definition for ancillary rural earthworks: "Earthworks associated with normal agricultural and horticultural practices, such as: <ul style="list-style-type: none"> <li>Maintenance and construction of facilities, devices and structures typically associated with farming activities including but not limited to farm tracks, driveways and unsealed parking areas, stock races, silage pits, farm drains, farm effluent ponds, and feeding lots, fencing, crop protection and sediment control measures</li> <li>Irrigation and land drainage</li> <li>The burying of material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the</li> </ul>	Winter shutdown of ancillary rural earthworks would shut down normal agricultural and horticultural practice. Exclude these activities directly or delete the policy.

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
						Minister under the Biosecurity Act 1993."	
9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Forest & Bird, S261	S261.187	Oppose	Disallow	Do not introduce additional standards. Amend Rule WH.R17 (a) as follows: (a) (ii) for the control of pest plants, and or <b>(iii) to remove material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993, and</b>	Setbacks are managed through district plans. Pest plants may need to be removed for biosecurity purposes.
9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Greater Wellington Regional Council, S238	S238.030	Support	Allow	Delete (a) and (b) such that Rule WH.R23 applies to all earthworks, including ancillary rural earthworks.	Ancillary rural earthworks should be a permitted activity.
9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.	Greater Wellington Regional Council, S238	S238.031	Support in part	Allow in part	Amend Rule P.R25 as follows: "Farming activities on a property of between 4 and 20 hectares of land - permitted activity The use of land on a property of 4 hectares or more and less than 20 hectares for..."	Rules should relate to the effective area used rather than parcel size.
9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land - permitted activity.	Greater Wellington Regional Council, S238	S238.032	Oppose	Disallow	Disallow. Amend as follows: a farm environment plan in respect of the land and associated land use is supplied to <b>a farm environment plan certifier</b> Wellington Regional Council by <b>within 18 months after</b> the date set out in Table 8.6 for the part Freshwater	The Resource Management (Freshwater Farm Plans) Regulations 2023 call for an 18-month transition period from when freshwater farm plans are phased in for the region to when they must be submitted to a certifier. It is then the obligation

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
						Management Unit in which the farm is located, and... (c) a farm environment plan certifier certifies in writing that: (i) the farm environment plan supplied to the Wellington Regional Council has been prepared in accordance with, and meets the requirements of Schedule Z (farm environment plan) and <b>the Resource Management (Freshwater Farm Plans) Regulations 2023, Schedule 36</b> (farm environment plan - additional); or (ii) where the farm environment plan is certified under section 217G of Part 9A of the RMA, that the farm environment plan meets the requirements of condition (b), and...	of the certifier to send the certification to the council.
9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Forest & Bird, S261	S261.200	Oppose	Disallow	Disallow.	This rule will make crop rotation near impossible, an essential practice for soil health and managing pests and diseases. Making the rule more restrictive will essentially prohibit crop rotation and land use change to horticulture, a low emissions land use.
9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Wairarapa Federated Farmers, S193	S193.156	Support	Allow	Delete P.R28	This rule as notified would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure.



Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
12 Schedules	B1. Principles	Wairarapa Federated Farmers, S193	S193.164	Support in part	Allow in part	Amend as follows: Freshwater Action Plans will: 1. be prepared in partnership with mana whenua <b>and the community</b> , and...	Amend for improved consistency with NPS-FM
12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Wairarapa Federated Farmers, S193	S193.184	Support	Allow	Delete Schedule 36.	This is unnecessary duplication of national freshwater farm plan requirements.

# **Further Submission on Proposed Plan Change 1 to the Greater Wellington Regional Council Natural Resources Plan by Kāinga Ora – Homes and Communities**

## **Clause 8 of Schedule 1 to the Resource Management Act 1991**

**To:** Greater Wellington Regional Council  
*Submission by email via: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)*

**Name of Further Submitter:** Kāinga Ora – Homes and Communities

1. **Kāinga Ora – Homes and Communities** (“**Kāinga Ora**”) makes this further submission on the **Proposed Plan Change 1** (“**PC1**”) to the Greater Wellington Regional Council Natural Resources Plan in support of/in opposition to original submissions to the **PC1**.
2. Kāinga Ora has an interest in PC1 that is greater than the interest the general public has, being an original submitter on the PC1 with respect to its interests as Crown entity responsible for the provision of public housing, and its housing portfolio in the Greater Wellington Region.
3. Kāinga Ora makes this further submission in respect of submissions by third parties to the PC1.

### **Reasons for further submission**

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:
  - (a) The reasons set out in the Kāinga Ora primary submission on the PC1.

- (b) In the case of the Primary Submissions that are opposed:
- (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 ("**RMA**");
  - (ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
  - (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
  - (iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora primary submission.
- (c) In the case of Primary Submissions that are supported:
- (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
  - (ii) The reasons set out in the Primary Submissions; and
  - (iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

**DATED 8 March 2024**

**Kāinga Ora – Homes and Communities**



**Brendon Liggett**

**Manager – Development Planning**

**ADDRESS FOR SERVICE:**

*Kāinga Ora – Homes and Communities*

*PO Box 74598*

*Greenlane, Auckland*

*Attention: Development Planning Team*

*Email: [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)*

## 10. Appendix A – Further Submission Table

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Ara Poutama Aotearoa the Department of Corrections	S248.022 S248.046	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces  AND  Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces	Amend	Notes raingardens and bioretention devices referred to in Clause (a)(ii) are not defined terms in the plan and both terms need to be added to Plan to provide certainty for users.  Amend definitions section to include a definition of "raingarden" and "bioretention device".	Support	Kāinga Ora supports the addition of these definitions to provide clarity for plan users.	Allow
Ara Poutama Aotearoa the Department of Corrections	S248.026 S248.050	Policy WH.P29: Management of earthworks.  AND  Policy P.P27: Management of earthworks sites.	Amend	Considers the word "risk" should be replaced with "adverse effects", as resource management policies should seek to manage actual or potential adverse effects of an activity, rather than risks generally. Notes the requirement to retain soil and sediment on site under clause (a) does not recognise that soil and sediment may need to be removed from site in a controlled manner (for example, to a cleanfill area) as part of the works associated with the maintenance, upgrading, or development of existing developed sites. To recognise this, submitter considers that clause (a) should be amended to seek the uncontrolled loss of soil and sediment from site is minimised, rather than requiring all soil and sediment to be retained on site. Considers clause (b) should be qualified with "where practicable" to recognise that any limits placed on land disturbance should be reasonable and proportionate, particularly in the context of the good management practices already required by clause (a).  Amend as follows: Policy WH.P29: Management of earthworks The <del>risk</del> <b>adverse effects</b> of sediment discharges from earthworks shall be managed by: (a) <del>requiring retention</del> <b>minimising the uncontrolled loss</b> of soil and sediment on the land	Support	Kāinga Ora supports the proposed changes to this policy where consistent with its primary submission. Kāinga Ora considers that the changes provide clarity in terms of movement of soil from site where required for cleanfill.	Allow

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), for the duration of the land disturbance, and (b) limiting, <b>where practicable</b> , the amount of land disturbed at any time, and (c) designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and (d) requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in place and are maintained until the land is stabilised against erosion			
Civil Contractors New Zealand	S285.018 S85.030	Policy WH.P30: Discharge standard for earthworks.  AND Policy P.P28: Discharge standard for earthworks sites.	Oppose	Amend to either specify which sort of test is used and leave this to implementation guidance or refer to the correct onsite test method (NTU).	Support	Kāinga Ora supports testing for turbidity as a measure for earthworks consents and the allowance for on-site test method (NTU) to ensure efficient testing which does not require laboratory results that can take 1-2 weeks to receive results.	Allow
Civil Contractors New Zealand	S285.019 S285.031	Policy WH.P31: Winter shut down of earthworks.  AND Policy P.P29: Winter shut down of earthworks.	Oppose	Delete policy WH.P31  If amended, ensure sufficient and appropriate exemptions exist to provide some ability for winter earthworks in situations where potential sediment can be well managed and controlled. At a minimum, a provision should be added for 'Regionally significant infrastructure'.	Support	Kāinga Ora supports the deletion of this policy, or if amended, amendment to adequately provide for winter earthworks where potential sediment can be well managed.	Allow
Cuttriss Consultant Ltd.	S219.006	Definition – Hydrological Control	Amend	Request the following to the definition be added:  <u>Management measures may include:</u> <u>a) Rapid Infiltration devices such as soak pits;</u> <u>b) Permeable paving; or</u> <u>c) Rainwater retention tanks which:</u> <u>i) are plumbed into the toilet and/or an outdoor tap or taps; and</u> <u>ii) where connected to toilets, are capable of being topped up by potable water supply to a maximum volume of</u>	Support in part	Kāinga Ora supports more specific technical standards to clarify what hydrological controls are trying to achieve, including by achieving hydraulic neutrality from pre-development flows.	Allow in part

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p><u>100L.</u></p> <p><u>Where these measures provide a minimum retention volume of 5mm runoff depth over the impervious area which hydrology controls are required; and</u></p> <p><u>Provide detention (temporary storage) for the difference between the predevelopment and post-development runoff volumes from the 95th percentile, 24 hour rainfall event minus the 5 mm retention volume or any greater retention volume that is achieved, over the impervious area for which hydrology mitigation is required (unless further detention or infiltration measures are utilised downstream).</u></p> <p><u>Note:</u></p> <p><u>Compliance with the definition can be demonstrated by installing a rainwater tank in accordance with Approved Solution #1 of Wellington Water's Managing Stormwater Runoff Version 4 June 2023</u></p>			
Cuttriss Consultant Ltd.	S219.013, S219.014, S219.026, and S219.027	<p>Rule WH.R2/P.R2: Stormwater to land - permitted activity</p> <p>AND</p> <p>Rule WH.R3/P.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity.</p>	Amend	<p>Amend Rule WH.R2 to better reflect the requirements for individual properties.</p> <p>Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater:</p> <p>(a) that is not from a high risk industrial or trade premise, or</p> <p>(b) that <del>does not connect to</del> <del>does not discharge from, or to,</del> a local authority stormwater network, is a permitted activity provided the following conditions are met.</p> <p>Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water - permitted activity</p> <p>The discharge of stormwater from an existing individual property into water, or onto or into land where it may enter a surface water body or coastal water,</p> <p>(a) that is not from a high risk industrial or trade premise, or</p> <p>(b) that is not from a port, airport or state highway, or</p> <p>(c) that <del>does not connect to</del> <del>does not discharge from, or to,</del> a local authority stormwater network, is a permitted activity, provided the following conditions are met:</p>	Support	Kāinga Ora supports the relief sought to the extent that it is consistent with its submission. Kāinga Ora supports the relief sought that seeks to clarify that individual properties should be permitted under this rule to discharge to ground where it does not connect to the local authority stormwater network.	Allow

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Cuttriss Consultant Ltd.	S219.033	Schedule 30: A-Context	Not Stated	Amend the Part D calculation of level of contribution of Schedule 30 to:  Financial contributions shall be imposed as a condition of consent and will be collected by the local authority at the same time as payment of any other financial or development contributions are paid prior to the consent being given effect to.	Support	Kāinga Ora supports the relief sought to the extent that it is consistent with its primary submission. If a financial contribution policy was to remain, Kāinga Ora supports the relief sought by the submitter that payment would not be required at the beginning of construction, which could impact the financial viability to deliver larger scale projects.	Allow
Cuttriss Consultant Ltd.	S219.034	Schedule 30: D – Calculation of level of contribution	Amend	Amend the Part D financial contribution as follows:  Whaitua Te Whanganui-a-Tara <del>\$4,240 2,827</del> Te Awarua-o-Porirua Whaitua <del>\$4,500 3,066</del> (Noting the submission point above, whereby we seek to remove charges based on EHU and therefore this table should be deleted in entirety) Whaitua Te Whanganui-a-Tara <del>\$858 572 \$360 240</del> Te Awarua-o-Porirua Whaitua <del>\$858 572 \$360 240</del>  Furthermore, these numbers should be assessed following a peer reviewed Economic Impact Assessment.	Support	Kāinga Ora supports the relief sought to the extent that it is consistent with its primary submission. If financial contributions are to remain, Kāinga Ora supports the review and justification of the financial contributions notified in PC 1.	Allow
Enviro NZ Services Ltd.	S209.006 and S209.035	Policy WH.P6/P.P8: Cumulative adverse effects of point source discharges.	Amend	(b) (i) at a minimum, an application for a resource consent includes a defined programme of work for upgrading the discharge (if target attribute state is not already met), in accordance....	Support	Kāinga Ora supports the relief sought by the submitter to recognise where suitable treatment is already in place and the target is met.	Allow
Enviro NZ Services Ltd.	S209.010 and S209.037	Policy WH.P10/P.P10: Managing adverse effects of stormwater discharges.	Amend	(b) generally using hydrological control and water sensitive urban design measures...	Support	Kāinga Ora supports the relief sought to the extent that it should be recognised that hydrological control or water sensitive urban design measures are not always required.	Allow
Enviro NZ Services Ltd.	S209.058	Schedule 28: Stormwater Contaminant Treatment.	Amend	Amend schedule to better reflect using industry best practice.	Support	Kāinga Ora supports the relief sought to allow for more approaches to treatment and prevention methods.	Allow
Environmental Defence Society	S222.028	Table 8.2 Target attribute states for lakes.	Amend	Include the attributes from Table 3.5 which previously applied but have not been carried over - including sediment, mahinga kai, fish, and macroalgae.  Amend the timeframe for achievement of states to 2030	Oppose in part	Kāinga Ora opposes this submission to the extent that it is inconsistent with its primary submission.	Disallow in part



Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Environmental Defence Society	S222.035	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	Amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities. Support removal of stock from waterbodies and the coastal environment.	Oppose	Kāinga Ora opposes this submission to the extent that it is inconsistent with its primary submission.	Disallow
Environmental Defence Society	S222.063	Rule WH.R23: Earthworks - permitted activity.	Amend	Considers greater setback from waterbodies and coastal marine area is required. Also need to clarify interaction of rule with NES-PF/CF.	Oppose	Kāinga Ora opposes the relief sought in relation to greater setbacks.	Disallow
Environmental Defence Society	S222.064	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	Make a discretionary activity. Also need to clarify interaction of rule with NES-PF/CF.	Oppose	Kāinga Ora opposes the relief sought to make the rule a Discretionary activity.	Disallow
Environmental Defence Society	S222.082	Table 9.3: Harbour arm catchment contaminant load reductions.	Amend	Amend 2040 to 2030 to reflect the urgency of addressing freshwater issues and the biodiversity crisis	Oppose	In line with the Kāinga Ora primary submission, Kāinga Ora opposes any shortened timeframes.	Disallow
Forest and Bird	S261.008	General comments - overall	Not Stated	Notes the current provision for a "recognised nitrogen risk assessment tool" allows a tool to be used to fulfil the policies in the plan by a process outside Schedule 1, enabling council to approve any tool provided it is "quantitative" and assesses risk of nitrogen discharge. Questions the lawfulness of delegation, as no other criteria or processes are provided for approval. Considers it critical that tools account for biophysical factors and relate to the actual discharge or environmental effects of the discharge. Considers any "recognised nitrogen risk assessment tool" must be subject to wider public scrutiny before being included in the plan.  Consult on any recognised nitrogen risk assessment tool before including in the plan.	Oppose in part	Whilst Kāinga Ora agree that any changes to critical documents should be consulted on, Kāinga Ora opposes any such documents that require changes to be made at a regular/short term interval to be included within the Regional Plan. Any changes would then require a Schedule 1 plan process.	Disallow in part
Forest and Bird	S261.075 S261.155	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.  AND Policy P.P13:	Amend	Considers reducing adverse effects to "the extent practicable" enables cost considerations to be factored into decision-makers, which often avoid more environmentally responsible approaches. Considers reference to "where possible" is required.  Amend as follows: The adverse effects of stormwater discharges from new greenfield development shall be minimised, and adverse effects of stormwater discharges from existing urban areas reduced to the extent <b>possible practicable</b> .	Oppose	Subject to the Kāinga Ora primary submission, Kāinga Ora opposes the proposed wording change.	Disallow

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
		Stormwater Discharges from new and redeveloped impervious surfaces.		Insert direction requiring water sensitive design for new and redeveloped areas. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.			
Forest and Bird	S261.090 S261.169	Policy WH.P29: Management of Earthworks  AND Policy P.P27: Management of earthwork s sites.	Amend	Considers setback distances from waterways (of 10m or more) are an effective method of ensuring fine sediment particles from earthworks are removed.  Add new clause:(x) <b>requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area.</b> Any further consequential or alternative relief as may be necessary and appropriate to address concerns	Oppose	Kāinga Ora considers that this clause reads as a rule and not a policy. In addition, setbacks to water bodies etc should be nuanced in regard to the type of water body and the manner in which sediment controls are provided. A blanket policy arm is not considered appropriate.	Disallow
Forest and Bird	S261.091 S261.170	Policy WH.P30: Discharge standard for Earthworks  AND Policy P.P28	Amend	Considers controls on deposited sediment are also required.  Amend to include new clause: (e) the discharge shall not, after the zone of <b>reasonable mixing, result in:</b> <b>(i) a change in deposited sediment cover of more than 20%, or</b> <b>(ii) an increase in deposited sediment to be more than 20% of the bed</b> Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Oppose in part	Kāinga Ora considers that this clause reads as a rule and not a policy.	Disallow in part
Forest and Bird	S261.099 S261.176	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity  AND Rule P.R5	Oppose	Considers greater Council oversight is required for elements of the rule, noting clause (h) is not sufficiently certain and enforceable for a permitted activity. Considers higher activity status and adding clearer and enforceable standards are required to ensure compliance with RMA s70, and that cumulative significant adverse effects do not arise. Considers WSUD should be required at minimum.  Reclassify as a controlled activity. Include enforceable alternative standards. Distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification. Require "water sensitive urban design" as a condition of consent, including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens. Any further	Oppose	Kāinga Ora oppose the elevation of this rule to a controlled activity from permitted. Kāinga Ora also oppose the requirement to include rainwater storage tanks at a property level. WSUD measures should also be considered at a development scale basis to suit the needs of the overall site.	Disallow

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				consequential or alternative relief as may be necessary and appropriate to address concerns.			
Forest and Bird	S261.100 S261.177	Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity  AND Rule P.R6	Oppose	Considers controlled activity status inappropriate, particularly as the rule has effect in the coastal environment where the NZCPS applies. Considers inability to refuse consent may not give effect to NZCPS directions and RMA s107(1) and considers higher activity status is required. Seeks deletion of clause (c) as it is inconsistent with the effects management hierarchy.  Reclassify as a discretionary activity. Delete clause (c). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Oppose in part	Kāinga Ora oppose the elevation of this rule from controlled to discretionary activity status.	Disallow in part
Forest and Bird	S261.116	Rule WH.R23: Earthworks - permitted activity.	Oppose	Considers a 5m setback is insufficient to protect ecosystems and maintain water quality. Considers ephemeral watercourses should be referred to as they have ecological value and can reduce contaminant loads when protected.  Amend as follows: (d) the earthworks shall not occur within, <del>or within a 5m</del> <b>within a 10 m</b> setback from, <del>of a</del> surface water body, <b>ephemeral watercourse</b> , or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e ) soil or debris from earthworks is not placed where it can enter a surface water body, <b>ephemeral watercourse</b> , or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, <b>ephemeral watercourse</b> or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, <b>ephemeral watercourse</b> , or the coastal marine area, including via a stormwater network. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Oppose	Kāinga Ora consider that a 10m setback is onerous and does not differentiate between watercourse type or quality in this instance, (especially in regard to ephemeral streams). Effects can be appropriately mitigated through robust erosion and sediment controls.	Disallow
Forest and Bird	S261.117 S261.194	Rule WH.R24: Earthworks - restricted discretionary activity.	Oppose	Considers the matters of discretion are not wide enough to ensure all adverse effects on all important ecological values are addressed.	Oppose	Subject to the Kāinga Ora primary submission, Kāinga Ora oppose the elevation of this rule from RDA to discretionary and do not consider that additional matters of discretion are required as this is overly onerous.	Disallow

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		AND Rule P.R23		Reclassify as a discretionary activity rule. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.			
Greater Wellington Regional Council	S238.002	General comments - definitions	Amend	<p>Suggest a new definition of "urban zone" to support the definition of unplanned greenfield development.</p> <p>Include new definition as follows:  <b>Urban zones are the following zones as set out in the National Planning standards:</b></p> <ul style="list-style-type: none"> <li>• Residential zones (large lot residential, low density residential, general residential, medium density residential, high density residential)</li> <li>• Commercial and mixed-use zones (neighbourhood centre, local centre, commercial, large format retail, mixed use, town centre, metropolitan centre, city centre)</li> <li>• Industrial zones (light industrial, general industrial, heavy industrial)</li> <li>• Special purpose zones unless it can be demonstrated that the special purpose zone is a rural zone</li> </ul>	Support	Kāinga Ora support the definition as it is in line with the National Planning Standards.	Allow
Greater Wellington Regional Council	S238.004	Hydrological control	Amend	<p>Considers there's a lack of clarity around what is required to be achieved through hydrological control, how this is done and there are different requirements needed for different scenarios.</p> <p>Provide greater specificity in the definition, policies and/or rules relating to hydrological control to make it clear what is required to be achieved and how and in what circumstances (i.e. are different requirements needed in different scenarios). The inclusion of a metric should be considered.</p>	Support in part	Kāinga Ora supports this proposed amendment, however, consider any rules that are supported by WSUD guidance should be non-statutory and sit outside of the plan.	Allow in part
Porirua City Council	S240.011	Impervious surfaces	Amend	<p>Notes there is no rule requiring rainwater reuse in PC1 or the NRP. Supports 'roof areas with rainwater collection' being excluded, as this is regulated through the Three Waters Chapter of the Proposed Porirua District Plan subject to Wellington Water specifications that provide for some limited reuse for gardening but do not require tanks to be plumbed back into the house. Concerns that this is a significant cost that not been assessed in the s32 Evaluation.</p> <p>Amend definition as follows: Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: -roofs -paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and</p>	Support in part	Whilst Kāinga Ora support PCC in the intent of their submission point, Kāinga Ora do not consider the deletion of "a rain tank utilised for grey water reuse (permanently plumbed)" is a solution. Kāinga Ora consider that this, and the addition of rain tanks for attenuation should be included within the definition so as to allow for both options.	Allow in part

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				excludes: -grassed areas, gardens and other vegetated areas -porous or permeable paving -slatted decks which allow water to drain through to a permeable surface - porous or permeable paving and living roofs -roof areas with rainwater collection and reuse -any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)			
Hutt City Council	S211.013	Policy WH.P10: Managing adverse effects of stormwater discharges	Amend	<p>Supports in principle the regulation of stormwater contaminants through hydrological control and WSUD to improve freshwater outcomes. Notes there is overlap with Hutt City District Plan rules which also manage hydrology of stormwater to manage the demand on the three waters network from urban development, which is not addressed in the s32 report. Considers PC1 provisions are light on detail on how hydrological controls and WSUD will be implemented, in comparison with the THW-Three Waters chapter of the Draft Hutt City District Plan which requires hydraulic neutrality measures to assist with managing peak stormwater runoff from development sites so the risk of downstream flooding is not increased, and assist with prolonging the life of existing stormwater management systems. Considers the inclusion of technical specifications in the NRP can assist smaller developments as they could rely on the technical specifications without having to develop bespoke solutions for their site and undertaking expensive hydrological and/or engineering calculations to demonstrate compliance. Supports the recognition of catchment-scale communal schemes.</p> <p>Develop a more comprehensive policy and implementation framework with regard to hydrological control and water sensitive urban design measures, including acceptable solutions and amend policy accordingly.</p>	Support in part	Kāinga Ora supports the need for more detail in regard to WSUD but considers any guidance document should be non-statutory to allow for changes as process/design improvements are made.	Allow in part
Upper Hutt City Council	S225.073	Policy WH.P8: Avoiding discharges of specific products and waste.	Oppose	<p>Concerned high level policy relating to storm water network where consents already exist. Questions whether responsibility of consent holder to manage and monitor?</p> <p>Notes no specific thresholds so questions if washing cars and houses, animals confined in a paddocks, or driveways require a consent. Notes no consideration for environmentally friendly cleaning products. Considers scale for wet cement unclear, and questions if it relates to larger scale developments or small scale activities where cement pads are constructed for heat pump fans or sheds etc. Latter would be unworkable and unenforceable.</p>	Support in part	Subject to the Kāinga Ora primary submission, Kāinga Ora agrees that the way in which this policy and subsequent rules are written, that small domestic tasks such as washing a car at home would be subject to this policy and subsequent rule framework, which is considered too onerous and not the intention of GWRC.	Allow in part

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				<p>Appears policy has not been well considered and is unclear what it is trying to achieve.</p> <p>Seek clarity on what animal effluent and what chemical cleaner as it is impossible to manage back yard cats and dogs for example, and not all chemical cleaners are the same. Identify scale for wet cement provision. Amend to clarify which discharges this policy relates.</p>			
Upper Hutt City Council	S225.075	Policy WH.P10: Managing adverse effects of stormwater	Amend	<p>Concerned chapeau of policy is too broad and questions whether, in relation to (c)(ii), is it also appropriate to include attenuation?</p> <p>Unclear what is meant by "load reduction factor" and concerned this might not be practical at an individual scale where discharge from site is into a stormwater network such as an individual house.</p> <p>Notes may be inappropriate for rural properties where a small discharge to land after rainwater collection, for example. Maintenance required for these types of stormwater treatment systems to be effective is inappropriate for individual properties and likely to result in failure.</p> <p>The scope of this policy should be narrowed to apply only to stormwater networks not individual developments within a network, except for point source discharges to surface water. This should not apply to one house or rural scenarios which discharge directly to land via soak pits or other similar systems.</p>	Support in part	Subject to the Kāinga Ora primary submission, Kāinga Ora considers that attenuation should be considered at smaller scales.	Allow in part
Upper Hutt City Council	S225.094	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Oppose	<p>Concerned with: - lack of thresholds or scope of rule application - lack of specificity - some vehicle cleaning products are biodegradable and less harmful to the environment than others - fundamental inability to monitor against this rule - some of these in small quantities may be suitable for discharging to land, e.g. biodegradable cleaning products, cooking oil. As written, means that washing any car or washing house windows or walls would be a prohibited activity. Should a car fail, such as a boiled radiator or oil leak, this would also be a prohibited activity. Considers prohibited activities need to be clear and measurable without any need for interpretations and appears this rule has not been fully considered - particularly as to its purpose, applicability and practical (and reasonable) implementation.</p> <p>Delete or significantly rewrite to a more specific and reasonable approach. If a rule like this is retained, seek a more permissive activity status such as restricted</p>	Support	Kāinga Ora agree that small scale domestic activities would be caught within this rule.	Allow

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				discretionary. However, we note that it is impractical to require consent for these small scale activities, such as washing windows. If retained, this rule needs further consideration.			
Wellington City Council	S33.042 S33.092	Policy WH.P9: General stormwater policy to achieve the target attribute states and Coastal water objectives.  AND Policy P.P9: General stormwater policy to Achieve the target attribute states and coastal water objectives	Amend	Supports in part the management of copper and zinc contamination however notes this is currently managed by District Plans.  Amend policy to clarify GWRC role is managing copper and zinc contamination.	Support in part	Subject to the Kāinga Ora primary submission, Kāinga Ora agrees that this is appropriately dealt with at a district scale.	Allow in part
Wellington City Council	S33.043 S33.093	Policy WH.P10: Managing adverse effects of stormwater discharges  AND Policy P.P10: Managing adverse effects of stormwater discharges	Amend	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Identifies that development discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network.  Amend as follows: Policy WH.P10: Managing adverse effects of stormwater discharges All stormwater discharges and associated land use activities that is not managed by a stormwater management strategy shall be managed by..	Support in part	Subject to the Kāinga Ora primary submission, Kāinga Ora agrees that this is appropriately dealt with at a district scale.	Allow in part
Wellington City Council	S33.046 S33.096	Policy WH.P14: Stormwater Discharges	Oppose	Considers proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes. Identifies that development	Support in part	Subject to the Kāinga Ora primary submission, Kāinga Ora agrees that this is appropriately dealt with at a district scale.	Allow in part

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		from new and redeveloped impervious surfaces.  AND Policy P.P13:		discharges are already managed via a global stormwater discharge consent, and that the WCC PDP proposes to manage on-site stormwater for s9 land uses which includes both water quality and water quantity management. Considers that the regional plan rule framework duplicates consenting requirements and recommends the NRP stays silent on this and GWRC focus on higher-level management of discharge consents, including stormwater not connected to a local authority stormwater network			
Wellington City Council	S33.057 S33.058 S33.060 S33.061 S33.062 S33.064 S33.065 S33.107 S33.108 S33.110 S33.111 S33.112 S33.113 S33.115	Rule WH.R2: Rule WH.R3: Rule WH.R5: Rule WH.R6: Rule WH.R7: Rule WH.R10: Rule WH.R11: Rule P.R2: Rule P.R3: Rule P.R5: Rule P.R6: Rule P.R7: Rule P.R8: Rule P.R10:	Amend	Support in part. For the same reasons as set out in WH.R5 and to support integrated management and to remove the proposed overlapping consenting requirements from territorial authorities this rule should apply to stormwater that is discharged to local authority stormwater network.  Rule WH.R2: Stormwater to land - permitted activity The discharge of stormwater onto or into land, including where contaminants may enter groundwater: (a) that is not from a high risk industrial or trade premise, or (b) <del>that does not discharge from, or to, a local authority stormwater network</del> that written permission has been obtained from the owner of the local authority stormwater network, is a permitted activity provided the following conditions are met...	Support in part	Subject to the Kāinga Ora primary submission, Kāinga Ora agrees that this is appropriately dealt with at a district scale.	Allow in part
Wellington City Council	S33.148 - 151	Maps 86 - 89	Oppose	Concerns regarding the provision framework associated with the mapping of unplanned greenfields and whether it is the most appropriate way to achieve the objectives and policies of the NPS-FM 2020. Encourages GWRC to reconsider the appropriateness and legality of the proposed prohibited provisions.  Amend boundaries to include all open space zones within the urban boundary.	Support	Kāinga Ora support the exclusion of open space zones from the 'unplanned greenfield areas' and assume this is the intent of WCC's submission points.	Allow
Wellington Fish and Game Regional Council	S188.003	General comments - water bodies	Amend	Considers all waterbodies should have Target Attribute States including estuaries, wetlands and groundwater. Considers wetlands have been excluded in the NRP PC1 from having Target Attribute States set.  Seeks all waterbodies (including wetlands) have Target Attribute States.	Oppose	Kāinga Ora considers that this proposed amendment is too onerous and would require an unattainable level of recording and consenting.	Disallow



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Wellington Fish and Game Regional Council	S188.064 S188.065	Policy WH.P29: Management of earthworks.  Policy WH.P30: Discharge standard for earthwork s.	Not Stated	Considers if Erosion and Sediment Control Guideline (2021) was sufficient, there would be no sediment in waterways from earthworks. Notes earthworks still currently noted to cause sediment inputs into waterways around region, so increased measures to control inputs are required.	Oppose	Kāinga Ora consider the Erosion and Sediment Control Guideline (2021) sufficient in managing sediment and erosion control. Any changes to this need to be adequately consulted on.	Disallow
Wellington Water Ltd.	S151.003	General Comments – target attributes table	Oppose	The plan change include guidance or provisions that outline how proportional contribution to meeting the TAS can be demonstrated, and more realistic timeframes in the relevant TAS tables.  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support in part	Kāinga Ora supports the need for guidance or provisions that outline how proportional contribution to meeting the TAS can be demonstrated.	Allow
Wellington Water Ltd.	S151.008	General Comments – Stormwater Management	Amend	PC1 be amended to remove unnecessary modelling requirements which are currently to be undertaken by the consent holder;  Greater Wellington be responsible for all state of the environment modelling; and Reference to modelling 'concentrations' are removed.  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support in part	Kāinga Ora supports the relief sought by the submitter that PC1 is amend to remove unnecessary modelling for SMS which will place an unreasonably high burden on consent holders.	Allow in part
Wellington Water Ltd.	S151.015	General Comments – current legislation	Not Stated	Seeks all changes to PC1 that are necessary to give effect to changes to the NPS-FM or its application, should such changes be progressed while PC1 is being considered.	Support	Kāinga Ora supports the submission that PC1 should align provisions that are necessary to give effect to any changes to the NPS-FM.	Allow
Wellington Water Ltd.	S151.021	Interpretation – Hydrological Control	Oppose	Amend definition to ensure it is consistent with (or at least not inconsistent with) the RPS definition and preserves flexibility for managing flows from small to large. Supports standards based on a specified depth of rainfall retention (e.g. retention of the first 5mm of rainfall depth).  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support in part	Kāinga Ora supports the submission that specific standards should be provided based on specified depth of rainfall retention.	Allow in part
Wellington Water Ltd.	S151.025	Interpretation – Stormwater Catchment or sub-catchment	Amend	Revise the definition for clarity. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support	Kāinga Ora supports that the definition should be reviewed and revised for clarity and intended outcome.	Allow

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Wellington Water Ltd.	S151.055	Objective WH.O2: The health and wellbeing of Te Whanganu i-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	Amend	Alter timeframe to 2060. Retain clause (a)  Amend clause (b): the hydrology of rivers and erosion processes, including bank stability, are <u>maintained and improved where degraded</u> and sources of sediment are reduced to a more natural level, and Combine or better distinguish clauses (f) and (g). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support in part	Kāinga Ora supports the relief sought to the extent that it is consistent with its submission, and further supports amendments to Clause B.	Allow in part
Wellington Water Ltd.	S151.055 S151.103	Objective WH.O3/P.P3: The health and wellbeing of coastal water quality, ecosystem s and habitats in Te Whanganu i-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Oppose	Provide further detail in relation to the baseline states and required timeframes in both this objective and Table 8.1.  Provide maps showing locations of high contaminant concentrations.  Amend objective to provide this further detail. In addition to the above, amend as follows:  The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is <u>maintained, or improved or meaningful progress has been made towards improvement</u> to achieve the coastal water objectives set out in Table 8.1, and by 2040 2060. Define 'high contaminant concentrations' in clause (b) Combine or better distinguish clauses (g) and (h) Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support in part	Kāinga Ora supports the relief sought to the extent that it is consistent with its primary submission. Kāinga Ora supports amendments to the objective that provide maps/detail regarding high contaminant concentrations and provide for meaningful progress in order to achieve the objectives.	Allow in part
Wellington Water Ltd.	S151.059 S151.106	Objective WH.O9/PO6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	Revise clause (a) as follows:  'where a target attribute state in Table 8.4 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 8.4, or meaningful progress has been made and'  Link huanga with Schedule B and improve wording. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support in part	Kāinga Ora supports in part the relief sought to the extent that it is consistent with its primary submission, primarily the amendments to provide for meaningful progress in order to achieve the objectives.	Allow in part

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Wellington Water Ltd.	S151.073 S151.109	Policy WH.P2/P.P2 Management of activities to achieve target attribute states and coastal water objectives.	Amend	<p>Clarify how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32.</p> <p>Provide clarity over relationship between 'non-regulatory methods' and 'work programmes'.</p> <p>Amend policy to the extent necessary to appropriately reflect these interrelationships. Amend provision as follows: <del>(b) encouraging and where appropriate, requiring that</del> redevelopment activities within existing urban areas <del>to shall</del> reduce the existing urban contaminant load, and <del>(c)</del> imposing hydrological controls on:</p> <p>(i) urban development and</p> <p>(ii) <del>where appropriate and practicable, stormwater discharges to rivers in relation to streambank erosion</del></p> <p>Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	Oppose in part	Kāinga Ora supports relief sought to the extent that it is consistent with its primary submission. Kāinga Ora opposes the requirement for redevelopment activities to reduce the existing urban contaminant load, but generally supports only requiring hydrological controls where appropriate and practicable in relation to SW discharges to rivers.	Allow in part
Wellington Water Ltd.	S151.083 S151.117	Policy WH.P14/P.P13: Stormwater discharges from new and redevelop ed impervious surfaces.	Amend	<p>Review policy, in particular the reference to mean annual runoff, to ensure that the policy imposes targets that are readily measurable, able to be easily implemented, and clearly relate to the effects of runoff on the environment.</p> <p>Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	Support	Kāinga Ora supports the review of the policy including the reference to mean annual runoff, and ensuring the policy clearly relates to the effects of runoff on the environment.	Allow
Wellington Water LTD	S151.093 S151.125	Rule WH.R5/P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Amend	<p>Concerned that (f) and (g) should not be occurring even if they are via the stormwater network and that it is the landowner's responsibility to resolve.</p> <p>Delete the following clause: <del>and where the discharge is not via an existing local authority stormwater network the discharge shall also not:</del></p>	Oppose	Removal of this part of the rule does not make sense given that this part of the rule captures effects from the un piped network.	Disallow
Winstone Aggregates	S206.047	Policy WH.P30: Discharge standard for earthworks.	Oppose	<p>Notes the policy refers to "an existing or new stormwater network" and "artificial watercourse" as a receiving environment. Considers the policy can only regulate discharges where they enter "water", in accordance with RMA s15, and that water within a stormwater network is not subject to Regional Council jurisdiction. Further notes artificial watercourses are often piped or within tanks and therefore not subject to RMA s15. Seeks changes to only refer to discharges to natural receiving waterbodies. Considers the requirement in clause (c) for a "suitably</p>	Support in part	<p>Subject to the Kāinga Ora primary submission, Kāinga Ora agrees that the policy can only regulate discharges where they enter "water", as defined by s2 and in accordance with s15 of the RMA.</p> <p>Kāinga Ora support changes to the earthworks definition in line with the Kāinga Ora primary submission.</p>	Allow in part

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				<p>qualified person" to monitor the discharge is not always practicable and will be unreasonably costly. Seeks amendment to provide discretion and to provide for a "suitably trained person". Considers the policy particularly prescriptive, reflecting conditions of a rule or consent rather than a policy directive.</p> <p>Submitter refers to their relief sought for the definition of "earthworks", to recognise current exceptions in the Operative NRP. Considers the policy will apply to earthworks of all kinds and scales. Considers the proposed policy and rule framework results in impracticalities due to the broad definition of earthworks, which is often not proportionate to the effects being managed.</p>			
Winstone Aggregates	S206.049 S206.052 S206.077 S206.079	<p>Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.</p> <p>Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity</p> <p>Rule P.R1: Point source discharges of specific contaminants - prohibited activity.</p> <p>Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity</p>	Amend	<p>Seeks amendment to reference to "stormwater network", noting that they are piped and therefore not considered "water" or subject to Regional Council jurisdiction. Considers the rule may apply to stormwater discharges to a surface waterbody from a stormwater network, but cannot manage effects before that point.</p>	Support in part	<p>Subject to the Kāinga Ora primary submission, Kāinga Ora agrees that the policy can only regulate discharges where they enter "water", as defined by s2 and in accordance with s15 of the RMA.</p>	Allow in part

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Woodridge Holdings Ltd	S255.007	General comments - urban development	Oppose	Notes that PC1 does not include a Water Sensitive Urban Design Guide and so Council is asking developers via PC1 to implement measures into developments which it has not considered and provided guidance on. Considers this document should be prepared at the same time or before PC1 as typical water sensitive urban design measures are not going to work in large parts of the region due to the topography and the nature of the underlying material. Considers the approach makes it difficult for applicants to know what is likely to be acceptable under the rules and will result in a huge waste of time and resources for all parties involved.	Support in part	Kāinga Ora agree that PC1 does not provide certainty in terms of sufficient treatment measures and agrees that guidance will provide clarity to plan users. Kāinga Ora considers that this document should however sit outside of the plan as a guidance document in order for it to be updated when required without the need for a Schedule 1 process.	Allow in part
Woodridge Holdings Ltd	S255.010	Erosion and sediment management plan	Amend	Notes there are definitions for plantation forestry and vegetation clearance on highest erosion risk land, but no definition associated with earthworks generally. Add a definition for an erosion and sediment control plan for general earthworks.	Support	Kāinga Ora supports this submission as it provides clarity for plan users.	Allow
Woodridge Holdings Ltd	S255.012	Impervious surfaces	Amend	Notes inconsistencies including porous or permeable paving which is permeable and is specifically excluded from the definition of impervious surfaces, when compacted metal is excluded. However, porous, or permeable paving, has to sit on top of a subgrade of compacted metal/gravel so that it does not settle over time. Questions if roof areas with rainwater collection and reuse, and any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed), are the same thing Notes that the 10,000 Ltr stormwater reuse tanks required by the KCDC District Plan are not designed to attenuate stormwater flows but to alleviate water supply issues and would have little impact upon stormwater flows. Considers a dedicated stormwater attenuation tank will empty over time and a level of attenuation for all rainfall events.  Remove, "roof areas with rainwater collection and reuse" and "any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)" from the exclusions and add "roof areas with rainwater attenuation" and "any impervious surfaces directed to a rainwater detention device" to the exclusion.	Support in part	Kāinga Ora supports this amendment to allow for clarity. This change also alleviates any issues for development in Kāpiti whereby additional measures may be required under PC1 where attenuation tanks are already required.  Kāinga Ora does however consider that instead of replacing "roof areas with rainwater collection and reuse" and "any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)", "roof areas with rainwater attenuation" and "any impervious surfaces directed to a rainwater detention device" <b>should be added to the exclusion.</b>	Allow in part
Woodridge Holdings Ltd	S255.014	Redevelopment	Amend	Considers the definition of redevelopment should not include the word redevelopment as that is what is being defined. Notes the definition uses the words "existing urbanized property" and "brownfield development" but does not define what these are. Suggests it will be hard to know what is an "upgrade" and what is minor maintenance.	Support in part	Kāinga Ora supports this submission insofar as it aligns with the Kāinga Ora primary submission. Kāinga Ora agrees that replacement of existing surfaces should not be subject to resource consent.	Allow in part

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				Suggests existing developments have consent or existing use rights and should have the right to replace existing hard surfaces without the need for resource consent and replacing an existing drive, where no household unit's or EHU'S are proposed is not a redevelopment but maintenance and the same applies to Councils' roads and other hard surfaces and infrastructure. It they are not being widened or lengthened and the surface area is the same or very similar then this is not redevelopment.			
Woodridge Holdings Ltd	S255.015	Stabilisation	Amend	<p>Considers applying a definition to part of the region and nothing to the rest is inequitable and confusing. The definition should acknowledge that some areas inherently stable without the need to measures to be undertaken, eg.: exposed rock surfaces.</p> <p>Provide one definition for the entire region. Amend to acknowledge that some areas are inherently stable and as such do not require stabilisation.</p>	Support	Kāinga Ora agree that definitions relating to parts of the region that aren't specific to the outcomes for that catchment should be applied across the whole region to provide plan clarity.	Allow
Woodridge Holdings Ltd	S255.029	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Oppose	<p>WH.P14(a)(i) requires 85% of the mean annual runoff volume of stormwater to be treated. No allowance is provided for treating to a higher level, where that is possible. Considers this encourages people to do the minimum but incentivising through rates relief or reduced financial contribution payments could result in a higher level of treatment.</p> <p>Provide incentives for treating more than 85% of the mean annual runoff volume of stormwater.</p>	Support in part	Subject to the Kāinga Ora primary submission, Kāinga Ora supports the intension of this submission point insofar that requiring financial contributions on top of 85% compliance does not incentivise development to achieve better outcomes.	Allow in part
Woodridge Holdings Ltd	S255.037 and S255.083	Rule WH.R23: Earthworks - permitted activity.	Oppose	<p>Considers it will not be possible to comply with these rules as their conditions specify that there should be no discharge of sediment and suggests the majority small scale earthworks which are currently permitted would need a consent to ensure compliance is not an issue. Concern about GW resourcing to accommodate the costs generated by PC1.</p> <p>Considers WRC's own ESCP Guidelines don't consider or provide solutions for the level of treatment required, which is greater than that of a permitted stormwater discharge. Notes that as a result of these rules, the pre-earthworks development is allowed to discharge a prescribed level of SS and the post-development site is allowed to discharge a prescribed level of SS but the development phase is not allowed any, and topography and permeability in Wellington and Porirua makes treatment difficult.</p> <p>Withdraw and redraft PC1 or amend Rules WH.R23 and P.P22 so that they allow an appropriate level of SS in any stormwater discharge. 50g/m3 to Schedule A sites and</p>	Support in part	Subject to the Kāinga Ora primary submission, as notified ,the rule requires EW consent for ALL EW (no matter scale) unless all discharge can be prevented, which essentially means water has to be contained on site until EW stabilisation. This is not practical and has resulted in most urban development, even small scale EW requiring a regional discharge consent.	Allow in part

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				100g/m <sup>3</sup> to any other water body are noted in WH.R3 (notes these levels may need to be amended following submission by experts in this field).			

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
<b>Name of Submitter:</b> (First and last name, or organisation / company)	Anna Carter, Land Matters Ltd
<b>Address for service:</b> (Email, or physical address) Please note an <u>email address</u> is the preferred method	anna@landmatters.nz
<b>Phone:</b> (Optional)	Insert
<b>Contact person for submission:</b> (If different to above)	Insert
<b>I wish to be heard in support of my submission at a hearing:</b>	Yes



<b>I would consider presenting a joint case at the hearing with others who make a similar submission:</b>	Yes
<b>2. Criteria applicable to Further Submitter:</b>	
<b>Only certain people may make further submissions</b> Please select the option that applies to you:	
<b>A)</b> I am a person representing a relevant aspect of the public interest; or	n/a
<b>B)</b> I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
<b>C)</b> I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Land Matters Ltd is a planning, surveying, engineering and project management company based on the Kāpiti Coast. Our company represents a number of landowners who own and/or occupy land in the Wellington Region and who have an interest in the provisions of GWRC's Proposed Natural Resources Plan because of their existing or potential future land use and occupation.

<b>3. For the further submitter to action</b>
Service of your further submission: Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b> Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a> . If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	Anna Carter	Friday, 8 March 2024
<b>Public information:</b> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a> . You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a> .		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if</li> </ul>

necessary.

- If you are providing suggested text amendments to a provision, please do so in the following format:

Suggested added text, shown as **bolded text** format

Suggested deleted text, shown as ~~struck through~~ format

**Please enter further submission points in the table on the following page(s)**

<b>4. Further submission points</b>					
Please complete the following table with details of which original submission points you support and/or oppose, and why.					
<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b>	<b>*Stance on the submission point:</b> (Support, Oppose, Oppose in part, Support in part, Not stated)	<b>*Decision sought:</b> (Allow, Disallow, Allow in part, or Disallow in part)	<b>Decision sought</b>  <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b>  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
<b>CUTTRISS CONSULTANTS</b>					
<b>Cuttriss Consultants S219.00</b>	S219.001	Support in part	Allow in part	The submitter seeks a definition of greenfield development as follows, “ <i>The use of land that is predominately vacant with a site area of 4,000m<sup>2</sup> or greater, where the proposal will result in the development of 3 of more lots or dwellings for residential purposes regardless of staging</i> ”. LML supports provisions in the plan to minimise contaminants from residual stormwater contaminants but does not necessarily support establishing different standards for development within existing urban areas and greenfield areas. As such, LML considers that references to greenfield areas should be removed from the proposed plan. If they are not removed, then LML recommends that a definition be included for greenfield development.	LML agrees that without a definition for greenfield development there may be uncertainty about which provisions in the proposed plan apply, particularly for those greenfield areas maybe within an existing urban area.
<b>Cuttriss Consultants S219.00</b>	S219.002 – S219.005; and S219.011 and S219.019 and S219.021	Support	Allow	LML supports withdrawal of PC1 to enable genuine consultation to occur, including with: the development community; landowners of greenfield landowners whereby the land has been identified as suitable for future urban use but not necessarily zoned future urban or urban;	LML considers that there has been a failure to carry out an evaluation to the level necessary to determine if proposed change 1 is the most appropriate way to achieve the purpose of the Act and National Policy Statement – Freshwater Water as well as achieving the

				and communities who have yet to have freshwater management units.	outcomes of the National Policy Statement on Urban Development.  LML considers that PC1 be delayed until all Whaitua processes have been completed – including the Whaitua Kāpiti.
<b>Cuttriss Consultants S219.00</b>	S219.006	Support in part	Allow in part	LML supports amending the definition of hydrological controls and changes to Policy P.P10 to reference acceptable solutions. LML recommends a reference to 'current best practice and/or minimum accepted specifications for design storms.	LML supports a definition for hydrological controls that provides clarity for applicants that achieves the outcomes required to manage potential adverse effects and which will avoid or mitigate natural hazards.
<b>Cuttriss Consultants S219.00</b>	S219.007	Support	Allow	That the <i>definition</i> for redevelopment exclude minor alterations and additions to existing buildings to provide for small redevelopment of existing sites as a permitted activity including but not limited to buildings up to 30m <sup>2</sup> in area.	This change is consistent with the changes to the Building Code to allow for buildings up to 30m <sup>2</sup> in area (subject to standards) without a building consent. Without this change, it is not clear how GWRC will monitor this requirement and the costs that will be incurred.
<b>Cuttriss Consultants S219.00</b>	S219.008	Support in part	Allow in part	That the rule to make unplanned a prohibited activity be removed from PC1; <i>but should that relief not be given</i> , LML supports an alternative outcome to amend the definition of greenfield development to include all areas not zoned urban within a District Plan.	LML agrees with this submitter that the rezoning of non-urban greenfield development areas is not always appropriate; and that there should remain a consent pathway that can achieves the environmental outcomes.  LML is also concerned that non-urban land identified in adopted growth strategies as being appropriate for priority future urban areas, but are yet to be zoned urban or future urban will be excluded by these provisions. Furthermore, TAs may decide to exclude these areas from their own

					District Plan reviews and Council initiated plan changes as the expectation from PC1 is that landowners pursue private plan changes for these areas. Lack of Council initiated involvement is likely to result in delays to developing non-urban greenfield land as multiple landowners may not be able to collaborate on a privately initiated plan changes; and landowners may be discouraged from pursuing this option due to costs and risks. Unintended consequences will be less land available for urban development affecting overall affordability of housing in the Wellington Region.
<b>Cuttriss Consultants S219.00</b>	S219 – 009	Support	Amend	To amend the policy WH.P2 ‘management of activities to achieve target attribute states and coastal water objectives’ to remove the reference to prohibiting unplanned greenfield development	For the reasons set out under submission point s219.002 – 005 and S219.008.
<b>Cuttriss Consultants S219.00</b>	S219.010	Support in part	Allow in part	Amend the policy wording of WH. P14(a) and (b) which requires the adverse effects of stormwater discharges from new and redeveloped impervious surfaces be reduced through stormwater treatments and hydrological controls either on-site or off-site; to allow for a water target and flow/volume state based outcome.	LML agrees with the submitter that “source controls” (i.e. no copper or zinc building materials) may achieve the outcomes sought by PC1 and that may negate the need for a “stormwater treatment system” as currently defined; and that this option should be provided for.
<b>Cuttriss Consultants S219.00</b>	S219.012 and S219.020 and S.219.025 and S219.031	Support	Allow	Delete the policy and related rules regarding winter shut down of earthworks.	Not all sites need to be shut down over the winter; and not all effects on sediment discharge occur over this period, as noted by this submitter. This is not the most appropriate method for managing these effects.
<b>Cuttriss Consultants S219.00</b>	S219.013 and S219.014 and	Support in part	Allow in part	Amend WH.R2 and WH.R3 to require consents under this permitted activity rule	LML agrees that connections to or from a local authority stormwater

	S219.022 and S219.026 and S219.027			where there is no current local authority stormwater network.	should be managed by the local authority rather than by consent.
<b>Cuttriss Consultants S219.00</b>	S219.015 and S219.028	Support	Allow	Remove provisions affect developments which have an existing resource consent which have a consent in place.	LML supports the changes proposed by the submitter for the reasons they have given. LML considers that the appropriateness of not providing for existing consent holders has not been considered.
<b>Cuttriss Consultants S219.00</b>	S219.016 and S219.017 and S219.018 and S219.029 and S219.030	Support in part	Allow in part	Amend policies and associated Rule WH.R6 and WH.R7 'Stormwater from new greenfield impervious surfaces – controlled activity' and rules WH.R6 and WH. R5 to reference to reference baseline as 30 October 2024; and to provide for soil infiltration rates less than specified on the basis of a suitably qualified person	LML agrees that it is not always possible to achieve hydrological controls either on-site or via a community hydrological facility and that PC1 should make provision for this where adverse effects can be appropriately managed.
<b>Cuttriss Consultants Ltd S219.00</b>	S219.032 and S219.033 and S219.034	Support in part	Approve in part	LML supports amending Policy WH.P2 to remove references to unplanned greenfield development requiring financial contributions by deleting Schedule 30 and amending Policy WH.P10 to delete references to financial contributions; and deleting Policy WH.P15 requiring financial contributions.  If this relief is not provided, then LML supports amending these provisions in some manner as set out by this submitter.	LML opposes the mandatory requirement for financial contributions (FCs) to be applied in PC1 to offset residual adverse effects for discharges of stormwater. LML considers that there are existing provisions in the RMA to manage those effects through conditions of consent. It is not clear how the Regional Council will utilise these FCs within each catchment to result in the positive effects required. Furthermore, Tas already make or can make provision in their District Plans for financial contributions which may include providing for stormwater infrastructure. TAs would be in the best position to receive these financial contributions.

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

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1. Details of further submitter	
<b>Name of Submitter:</b> (First and last name, or organisation / company)	Anna Carter, Land Matters Ltd
<b>Address for service:</b> (Email, or physical address) Please note an <u>email address</u> is the preferred method	anna@landmatters.nz
<b>Phone:</b> (Optional)	Insert
<b>Contact person for submission:</b> (If different to above)	Insert
<b>I wish to be heard in support of my submission at a hearing:</b>	Yes

<b>I would consider presenting a joint case at the hearing with others who make a similar submission:</b>	Yes
<b>2. Criteria applicable to Further Submitter:</b>	
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<b>B)</b> I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
<b>C)</b> I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Land Matters Ltd is a planning, surveying, engineering and project management company based on the Kāpiti Coast. Our company represents a number of landowners who own and/or occupy land in the Wellington Region and who have an interest in the provisions of GWRC's Proposed Natural Resources Plan because of their existing or potential future land use and occupation.

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If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	Anna Carter	Friday, 8 March 2024
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<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if</li> </ul>



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**Please enter further submission points in the table on the following page(s)**

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Please complete the following table with details of which original submission points you support and/or oppose, and why.					
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<b>PUKERUA PROPERTY GROUP LD</b>					
<b>Pukerua Property Group Ltd S241.00</b>	S241.001 – S241.035	Support in part	Allow in part	LML supports withdrawal of PC1 to enable genuine consultation to occur, including with: the development community; landowners of greenfield landowners whereby the land has been identified as suitable for future urban use but not necessarily zoned future urban or urban; and communities who have yet to have freshwater management units.	LML considers that there has been a failure to carry out an evaluation to the level necessary to determine if proposed change 1 is the most appropriate way to achieve the purpose of the Act and National Policy Statement – Freshwater Water as well as achieving the outcomes of the National Policy Statement on Urban Development.  LML also considers that PC1 be delayed until all Whaitua processes have been completed – including the Whaitua Kāpiti which will also allow time to incorporate any review on national planning documents as indicated will occur by the present government coalition.
<b>Pukerua Property Group Ltd S241.00</b>	S219.006 and S219.013 and S241.036	Support in part	Allow in part	That the provisions to make unplanned greenfield development prohibited activity be removed from PC1.  Should that relief not be given, LML supports an alternative outcome to amend	LML considers that the development of non-urban greenfield development areas via rezoning may not achieve the outcomes sought in a timely and cost-effective manner; and that

				<p>the definition of greenfield development to include all areas not zoned urban within a District Plan and in particular includes land that has been identified as being suitable for urban development through an approved growth strategy (but may not be zoned future urban or settlement zone).</p> <p>LML also considers that references to ‘other greenfield development’ be defined in PC1 so that it doesn’t unnecessarily capture greenfield land within the urban areas and which may be able to be serviced by a Council stormwater network.</p>	<p>there should remain a consent pathway that can achieves the same environmental outcomes. LML agrees with submitter S219 that land use control is a territorial authority function.</p> <p>LML is concerned that non-urban land identified in adopted growth strategies as being appropriate for priority future urban areas, but are yet to be zoned urban or future urban will be excluded by these provisions. Furthermore, TAs may decide to exclude these areas from their own District Plan reviews and Council initiated plan changes as the expectation from PC1 is that landowners pursue private plan changes for these areas. Lack of Council initiated involvement is likely to result in delays to developing non-urban greenfield land as multiple landowners may not be able to collaborate on a privately initiated plan changes; and landowners may be discouraged from pursuing this option due to costs and risks. Unintended consequences will be less land available for urban development affecting overall affordability of housing in the Wellington Region.</p>
<b>Pukerua Property Group Ltd S241.00</b>	S241.11	Support in part	Allow in part	Amend the wording of policy WH. P14 which requires the adverse effects of stormwater discharges from new and redeveloped impervious surfaces be reduced through stormwater treatments and hydrological controls either on-site or off-site; to allow for a water target and	LML considers that “source controls” (i.e. no copper or zinc building materials) may achieve the outcomes sought by PC1 and that may negate the need for a “stormwater treatment system” as

				flow/volume state based outcome to provide for source controls and other provisions that may also achieve the target FMU outcomes	currently defined; and that this option should be provided for.
<b>Pukerua Property Group Ltd S241.00</b>	S241.014	Support in part	Allow in part	LML agrees with the submitter to delete policy WH.P31 and policy WH.P29 relating to winter-works. If that relief is not upheld, LML's supports amending the relevant policies	Not all sites need to be shut down over the winter; and not all effects on sediment discharge occur over this period, as noted by this submitter. This is not the most appropriate method for managing these effects.
<b>Pukerua Property Group Ltd S241.00</b>	S241.009 and S241.020 – S241.030	Support in part	Allow in part	Provide for existing developments which have a consent in place prior to PC1 having legal effect.	LML considers that the appropriateness of not providing for existing consent holders has not been considered.
<b>Pukerua Property Group Ltd S241.00</b>	S241.015 – S241.018	Support in part	Allow in part	Amend provisions relating to the “use of land” and the “associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water” so that controls are only in place for larger scale earthworks as a controlled activity.	LML agrees with the submitter that a more realistic area calculation is required to address potential adverse effects on surface water bodies or coastal water that does not impose significant additional costs on land development, while achieving the water quality outcomes sought
<b>Pukerua Property Group Ltd S241.00</b>	S241.012 and S219.013 and S241.038	Support	Approve	LML supports amending Policy WH.P2 and WH.P15 to remove references to unplanned greenfield development requiring financial contributions by deleting Schedule 30 and deleting references to financial contributions in the relevant policies.	LML opposes the mandatory requirement for financial contributions (FCs) to be applied in PC1 to offset residual adverse effects for discharges of stormwater. LML considers that there are existing provisions in the RMA to manage those effects through conditions of consent. It is not clear how the Regional Council will utilise these FCs within each catchment to result in the positive effects required. Furthermore, TAs already make or can make provision in their District Plans for financial contributions which may include providing for stormwater

					infrastructure. TAs would be in the best position to receive these financial contributions.
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# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
<b>Name of Submitter:</b> (First and last name, or organisation / company)	Anna Carter, Land Matters Ltd
<b>Address for service:</b> (Email, or physical address) Please note an <u>email address</u> is the preferred method	anna@landmatters.nz
<b>Phone:</b> (Optional)	Insert
<b>Contact person for submission:</b> (If different to above)	Insert
<b>I wish to be heard in support of my submission at a hearing:</b>	Yes

<b>I would consider presenting a joint case at the hearing with others who make a similar submission:</b>	Yes
<b>2. Criteria applicable to Further Submitter:</b>	
<b>Only certain people may make further submissions</b> Please select the option that applies to you:	
<b>A)</b> I am a person representing a relevant aspect of the public interest; or	n/a
<b>B)</b> I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
<b>C)</b> I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Land Matters Ltd is a planning, surveying, engineering and project management company based on the Kāpiti Coast. Our company represents a number of landowners who own and/or occupy land in the Wellington Region and who have an interest in the provisions of GWRC's Proposed Natural Resources Plan because of their existing or potential future land use and occupation.

<b>3. For the further submitter to action</b>
<p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	Anna Carter	Friday, 8 March 2024
<p><b>Public information:</b></p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.</p> <p>You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if</li> </ul>

necessary.

- If you are providing suggested text amendments to a provision, please do so in the following format:

Suggested added text, shown as **bolded text** format

Suggested deleted text, shown as ~~struckthrough~~ format

**Please enter further submission points in the table on the following page(s)**



**4. Further submission points**

Please complete the following table with details of which original submission points you support and/or oppose, and why.

*Submitter name or, Submitter number of the submission you are commenting on:	*Submission point number:	*Stance on the submission point: (Support, Oppose, Oppose in part, Support in part, Not stated)	*Decision sought:  (Allow, Disallow, Allow in part, or Disallow in part)	Decision sought  <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons:  <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
<b>WOODRIDGE HOLDINGS LTD</b>					
Woodridge Holdings Ltd S255	S219.007	Support in part	Allow in part	LML supports withdrawing PC1 but in the event that relief is not forthcoming, LML supports the submitter's request to qualify what constitutes 'Water Sensitive Urban Design'. Although the term 'Water Sensitive Urban Design' is highlighted in certain provisions of PC1 there is no definition of it in the PC1. Furthermore, PC1 does not include a Water Sensitive Urban Design Guide.	LML considers that without such a definition or a guide there remains uncertainty as what constitutes water sensitive urban design.

## **Further Submission in support of or in opposition to submissions on PC 1 to the NRP for the Wellington Region**

**To: Greater Wellington Regional Council ([regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz))**

- 1. This is a further submission by the Manor Park and Haywards Residents Community Incorporate (“MPHRCI”)**
  
- 2. This further submission is in support or opposition to submissions by the following parties on Proposed Change 1 to the Natural Resources Plan for the Wellington Region (“PC1”):**
  - S183 Yvonne Weeber**
  - S186 Guardians of the Bays Inc**
  - S261 Forest & Bird (F&B)**
  - S222 Environmental Defence Society Inc. (EDS)**
  - S211 Hutt City Council (HCC)**
  - S238 Greater Wellington Regional Council (GWRC)**
  - S256 Waste Management NZ Limited**
  - S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)**
  - S219 Cuttriss Consultants Ltd**
  - S220 Rosco Ice Cream Ltd**
  - S213 Pareraho Forest Trust**
  - S161 Gillies Group Management Ltd**
  - S279 KiwiRail Holdings Limited**
  - S188 Wellington Fish and Game Regional Council**
  - S284 Friends of Waiwhetū Stream**

- **S072 Upper Hutt Rural Communities - Angela Marie Greig**
- **S059 Upper Hutt Rural Communities - Bob Anker**
- **S078 Upper Hutt Rural Communities - Bob Curry**
- **S079 Upper Hutt Rural Communities - Bob McLellan**
- **S071 Upper Hutt Rural Communities - Brendon Allen Greig**
- **S080 Upper Hutt Rural Communities - Bridget M Myles**
- **S063 Upper Hutt Rural Communities - Callum Graeme Ritchie Forbes**
- **S088 Upper Hutt Rural Communities - Colleen Munro**
- **S060 Upper Hutt Rural Communities - Darren Pettengell**
- **S081 Upper Hutt Rural Communities - David McCready**
- **S068 Upper Hutt Rural Communities - Gain Thomson**
- **S091 Upper Hutt Rural Communities - Graeme Shellard**
- **S087 Upper Hutt Rural Communities - Grant Munro**
- **S062 Upper Hutt Rural Communities - Jacqui Thompson**
- **S086 Upper Hutt Rural Communities - Jennifer Sparrow**
- **S089 Upper Hutt Rural Communities - Joan Elizabeth Hutson**
- **S077 Upper Hutt Rural Communities - JoAnn McCready**
- **S070 Upper Hutt Rural Communities - John Peter Boyle**
- **S066 Upper Hutt Rural Communities - Jon-Luke Clarke Harvey**
- **S084 Upper Hutt Rural Communities - Karen Nash**
- **S083 Upper Hutt Rural Communities - Kevin Nash**
- **S061 Upper Hutt Rural Communities - Lenard Drabble**
- **S064 Upper Hutt Rural Communities - Linda Forbes Williamson**
- **S075 Upper Hutt Rural Communities - Lynn Marion Bialy**
- **S082 Upper Hutt Rural Communities - Meaghan Fitzgerald**
- **S090 Upper Hutt Rural Communities - Peter Jeffery Hutson**
- **S067 Upper Hutt Rural Communities - Peter Thomson**
- **S073 Upper Hutt Rural Communities - Philip Eales**
- **S065 Upper Hutt Rural Communities - Rhiannon Jessica Forbes**
- **S076 Upper Hutt Rural Communities - Richard Charles Bialy**
- **S069 Upper Hutt Rural Communities - Susan Patricia Boyle**
- **S074 Upper Hutt Rural Communities - Teresa Eale**

3. **MPHRCI** is a person representing a relevant aspect of the public interest; and a person who has an interest in the proposal that is greater than the interest the general public has. MPHRCI represents the views of the majority of the Manor Park and Haywards community.
4. **MPHRCI** wishes to be heard in support of this further submission.
5. If others make a similar submission, **MPHRCI** will consider presenting a joint case with them at a hearing.

6. **Further Submitter Details**

 PP

a. **Signature of person making further submission**

Shellene Eksteen, Chairperson (phone  email: ([manorparkcommunity@yahoo.com](mailto:manorparkcommunity@yahoo.com))

b. **Signatory name, position, and organisation**

c. **Date:** 8 March 2024

**Address for service of person making further submission**

d. **Contact Person:** Ben Farrell, Cue Environmental Limited

e. **Email:** [ben@cuee.nz](mailto:ben@cuee.nz)

f. **Telephone:** 021767622

g. **Postal address:** PO Box 1922, Queenstown

**7. Our further submission is:**

Manor Park and Haywards Residents Community Incorporated supports or oppose parts of each of the abovementioned submissions, as identified below.

<b>Submitter Name</b>	<b>Submission Point Number</b>	<b>Stance</b>	<b>Decision Sought</b>	<b>Reasons</b>
S183 Yvonne Weeber	S183.001-423	Support	Allow	See below
S186 Guardians of the Bays Inc	S186.001-196	Support	Allow	See below
S261 Forest & Bird	S261.001-273	Support	Allow	See below
S222 Environmental Defence Society Inc.	S222.001-146	Support	Allow	See below
S211 Hutt City Council	S211.015, S211.022	Oppose	Disallow	See below
S213 Pareraho Forest Trust	S213.014, S213.020, S213.030	Support	Allow	See below
S238 GWRC	238.009	Neutral	Allow	See below
S256 Waste Management NZ Limited	S256.001-003, S256.005-012, S256.014	Oppose	Disallow	See below
S256 Waste Management NZ Limited	S256.004, S256.013	Neutral	Allow	Neutral
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.008	Oppose	Disallow	See below
S219 Cuttriss Consultants Ltd	S219.019	Oppose	Disallow	See below
S220 Rosco Ice Cream Ltd	S220.016	Oppose	Disallow	See below
S161 Gillies Group Management Ltd	S161.010, S161.014, S161.023	Oppose	Disallow	See below
S279 KiwiRail Holdings Limited	S279.001- S279.025	Support	Allow	See below
S188 Wellington Fish and Game Regional Council	S188.001- S188.097	Support	Allow	See below
S284 Friends of Waiwhetū Stream	S284.001 - S284.003	Support	Allow	See below
S247 Carrus Corporation Ltd	S247.001 - S247.034	Oppose	Disallow	See below

S072 Upper Hutt Rural Communities - Angela Marie Greig	Whole submission	Oppose	Disallow	See below
S059 Upper Hutt Rural Communities - Bob Anker	Whole submission	Oppose	Disallow	See below
S078 Upper Hutt Rural Communities - Bob Curry	Whole submission	Oppose	Disallow	See below
S079 Upper Hutt Rural Communities - Bob McLellan	Whole submission	Oppose	Disallow	See below
S071 Upper Hutt Rural Communities - Brendon Allen Greig	Whole submission	Oppose	Disallow	See below
S080 Upper Hutt Rural Communities - Bridget M Myles	Whole submission	Oppose	Disallow	See below
S063 Upper Hutt Rural Communities - Callum Graeme Ritchie Forbes	Whole submission	Oppose	Disallow	See below
S088 Upper Hutt Rural Communities - Colleen Munro	Whole submission	Oppose	Disallow	See below
S060 Upper Hutt Rural Communities - Darren Pettengell	Whole submission	Oppose	Disallow	See below
S081 Upper Hutt Rural Communities - David McCready	Whole submission	Oppose	Disallow	See below
S068 Upper Hutt Rural Communities - Gain Thomson	Whole submission	Oppose	Disallow	See below
S091 Upper Hutt Rural Communities - Graeme Shellard	Whole submission	Oppose	Disallow	See below
S087 Upper Hutt Rural Communities - Grant Munro	Whole submission	Oppose	Disallow	See below
S062 Upper Hutt Rural Communities - Jacqui Thompson	Whole submission	Oppose	Disallow	See below
S086 Upper Hutt Rural Communities - Jennifer Sparrow	Whole submission	Oppose	Disallow	See below
S089 Upper Hutt Rural Communities - Joan Elizabeth Hutson	Whole submission	Oppose	Disallow	See below
S077 Upper Hutt Rural Communities - JoAnn McCready	Whole submission	Oppose	Disallow	See below
S070 Upper Hutt Rural Communities - John Peter Boyle	Whole submission	Oppose	Disallow	See below

S066 Upper Hutt Rural Communities - Jon-Luke Clarke Harvey	Whole submission	Oppose	Disallow	See below
S084 Upper Hutt Rural Communities - Karen Nash	Whole submission	Oppose	Disallow	See below
S083 Upper Hutt Rural Communities - Kevin Nash	Whole submission	Oppose	Disallow	See below
S061 Upper Hutt Rural Communities - Lenard Drabble	Whole submission	Oppose	Disallow	See below
S064 Upper Hutt Rural Communities - Linda Forbes Williamson	Whole submission	Oppose	Disallow	See below
S075 Upper Hutt Rural Communities - Lynn Marion Bialy	Whole submission	Oppose	Disallow	See below
S082 Upper Hutt Rural Communities - Meaghan Fitzgerald	Whole submission	Oppose	Disallow	See below
S090 Upper Hutt Rural Communities - Peter Jeffery Hutson	Whole submission	Oppose	Disallow	See below
S067 Upper Hutt Rural Communities - Peter Thomson	Whole submission	Oppose	Disallow	See below
S073 Upper Hutt Rural Communities - Philip Eales	Whole submission	Oppose	Disallow	See below
S065 Upper Hutt Rural Communities - Rhiannon Jessica Forbes	Whole submission	Oppose	Disallow	See below
S076 Upper Hutt Rural Communities - Richard Charles Bialy	Whole submission	Oppose	Disallow	See below
S069 Upper Hutt Rural Communities - Susan Patricia Boyle	Whole submission	Oppose	Disallow	See below
S074 Upper Hutt Rural Communities - Teresa Eale	Whole submission	Oppose	Disallow	See below

## Reasons

Our natural environment should be protected or improved where it is degraded or risks being degraded, especially our remaining native bush areas and all streams and rivers in the Dry Creek Catchment and surrounding area. MPHRCI supports retention of provisions (and plan amendments) that will help achieve this outcome, and opposes provisions that will not help achieve or will frustrate this outcome.

30 Benmore Street had, until very recently, relatively high natural character and ecological values, open space values, and rural amenity values. Recent substantial vegetation clearance and earthworks activities on the site have resulted in significant adverse environmental effects which should be remedied and mitigated. There is substantial community objection to this land being rezoned from rural to urban.

MPHRCI does not agree with Waste Management New Zealand Limited that *“planning for the site to be used for a resource recovery park is well advanced, with several expert assessments undertaken that demonstrate the use is suitable and environmental effects and as such it should be considered part of the ‘planned / existing urban area’”*. This is a disingenuous and arrogant statement to make. There is considerable community concern about, and opposition to, 30 Benmore Street being considered as a potentially appropriate site for urban development, let alone being considered appropriate for industrial and waste management land uses.

MPHRCI does not agree with the relief sought by those submitters seeking to facilitate the rezoning of 30 Benmore Street to an urban zone. Similarly, MPHRCI does not agree with the submitters reasoning. 30 Benmore Street is rural land zoned for rural purposes and in no way should it be considered as urban or as ‘planned urban’. A prohibited activity status to prevent urban land uses on this site, or discharges to water from activities on this site, is appropriate.



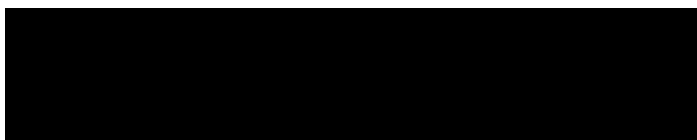
## Submission in support of, or in opposition to, submissions on *Proposed RPS change 1 for the Wellington Region.*

1. **Details of further submitter:** Manor Park Golf Club (Incorporated) (MPGC).

### **Address for service of person making further submission**

- a. **Contact Person:** Win van der Velde
  - b. **Email:** windv@hotmail.com
  - c. **Postal address:** Golf Road, Lower Hutt, 5019
2. MPGC is a person who has an interest in the proposal that is likely to be greater than the interest the general public has.
  3. The grounds for being in the above category are that MPGC resides in a community that could be affected by adjacent changes in zoning land from rural to industrial.
  4. MPGC does not wish to be heard in support of this submission.
  5. If others make a similar submission, MPGC will consider presenting a joint case with them at a hearing.
  6. Further Submitter Details

- a. **Signature of person making further submission**



Email: anne.alkema3@gmail.com

- b. **Signatory name, position, and organisation**

Dr Anne Alkema, MPGC Board Member, on behalf of

Win van der Velde, President, MPGC

**Date:** 8 March 2024

This submission is in support or opposition to submissions by the following parties on Proposed Change 1 to the Natural Resources Plan for the Wellington Region (“PC1”):

**S177 Transpower New Zealand Limited**

**S188 Wellington Fish and Game Council**

**S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)**

**S220 Rosco Ice Cream Ltd****S256 Waste Management NZ Limited****Our further submission is:**

Manor Park Golf Club (Incorporated) supports or opposes parts of each of the abovementioned submissions, as identified below.

<b>Submitter Name</b>	<b>Submission Point Number</b>	<b>Stance</b>	<b>Reasons</b>	<b>Decision Sought</b>
S177 Transpower New Zealand Limited	S177.003 S177.014	Support	Requests a definition of “greenfield development”, as does S220.001. This would provide clarity for any proposed development. But also noting that is the definition as proposed would need further definition of the term “regionally significant infrastructure”.	Allow
S177 Transpower New Zealand Limited	S177.010 S177.021 S177.031	Oppose	Requests removal of the term contaminants and leave only hazardous substances, as it is impractical to avoid the former. The term “contaminants” should remain, as along with hazardous substances they should be avoided in storm water discharge.	Disallow
S188 Wellington Fish and Game Council	All submission points	Support	In keeping with the sanctuary environment status that the MPGC has established and is looking to maintain.	Allow
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.005 S216.007	Oppose	Requests wording change from ‘prohibiting’ to ‘restricting’ unplanned greenfield development. Maintaining ‘prohibited’ activity means, <i>A prohibited activity may not be carried out. In addition, no resource consent can be sought or granted to authorise the activity.</i>  <i>Parties wishing to carry out a prohibited activity must apply for</i>	Disallow

			<p><i>a change to the plan to reclassify the activity ....<sup>1</sup></i></p> <p>Shifting to a “restricted” activity means <i>A restricted discretionary activity requires a resource consent before it can be carried out. The consent authority can exercise discretion as to whether or not to grant consent, and to impose conditions, but only in respect of those matters over which it has restricted its discretion in the plan or over which discretion is restricted in national environmental standards or other regulations ...<sup>2</sup></i></p> <p>This requested change implies the need for flexibility and discretion and it is not clear the extent to which there would be consistency in determining what should be allowed in a “restricted” definition and it is also unclear the extent to which there would be community consultation.</p>	
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.006 S216.008	Oppose	Requests wording change from ‘prohibited to ‘non-complying’ for storm water discharges in unplanned greenfield development. This means discharges can occur “ <i>with a resource consent</i> ” <sup>3</sup> meaning they may be allowable. This goes against the intent of the long-term freshwater vision for both Te Awarua-o-Porirua and Te Whanganui-a-Tara.	Disallow
S220 Rosco Ice Cream Ltd	S220.001	Support	Requests a definition of “greenfield development” as does S177.003 This would provide clarity for any proposed development.	Allow

<sup>1</sup> See <https://www.environmentguide.org.nz/rma/resource-consents-and-processes/>

<sup>2</sup> Ibid.

<sup>3</sup> Ibid

S220 Rosco Ice Cream Ltd	S220.004	Oppose	Requests definition change to allow storm water discharge to be more for developed sites than undeveloped grassed sites. This implies stormwater discharges could happen in an uncontrolled manner with the potential for contaminated and hazardous substances entering the waterways. This goes against the intent of the long- term freshwater vision for both Te Awarua-o-Porirua and Te Whanganui-a-Tara.	Disallow
S220 Rosco Ice Cream Ltd	S220.005	Support	Will provide the opportunity for all developers to be 'on the same page'.	Allow
S220 Rosco Ice Cream Ltd	S220.013	Oppose	This is connected to S220.004 in relation to storm water discharge in unplanned greenfield developments. This implies stormwater discharges could happen in an uncontrolled manner with the potential for contaminated and hazardous substances entering the waterways. This goes against the intent of the long- term freshwater vision for both Te Awarua-o-Porirua and Te Whanganui-a-Tara.	Disallow
S220 Rosco Ice Cream Ltd	S220.016	Oppose	See S216.006 S216.008	Disallow
S220 Rosco Ice Cream Ltd	S220.021	Oppose	Requests 30 Benmore Crescent be excluded from HCC unplanned greenfield area as shown on Map 89 given the work that has occurred on the site and the consent applications that are underway. This is connected to S256.014. Note the consents have not been approved and there has been no community consultation. There needs to be time for the community to be	Disallow

			consulted on the two consents that have been lodged. Noting there was no community engagement during the first consent process.	
S256 Waste Management NZ Limited	S256.006	Oppose	Requests amendment to the definition of unplanned Greenfield development and also exclusion of sites for which consents have been lodged. This has the potential to impact on the Manor Park Community for which consents have been lodged for a resource recovery park at 30 Benmore Crescent. The consents have not yet been approved.	Disallow
S256 Waste Management NZ Limited	S256.014	Oppose	While planning is underway and consents lodged, these have not been approved. 30 Benmore Street is rural land zoned for rural purposes which does not include industrial and waste management land uses.	Disallow
S256 Waste Management NZ Limited	S256.007 S256.008	Oppose	Does not seem to consider the impact of industrial and trade activities and storm water discharge on water ways.	Disallow
S256 Waste Management NZ Limited	S256.004 S256.013	Neutral	Neutral	Allow

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.

Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Meridian Energy Limited
Address for service: (Email, or physical address) Please note an <u>email address</u> is the	P O Box 2128 Christchurch Email: <a href="mailto:Andrew.Feierabend@MeridianEnergy.co.nz">Andrew.Feierabend@MeridianEnergy.co.nz</a>

preferred method	
Phone: (Optional)	
Contact person for submission: (If different to above)	As above (Andrew Feierabend)
I wish to be heard in support of my submission at a hearing:	Yes
I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Please see covering letter.

<b>3. For the further submitter to action</b>
<p>Service of your further submission:</p> <p>Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		08.03.2024
<p><b>Public information:</b> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> </ul>

- Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.
- If you are providing suggested text amendments to a provision, please do so in the following format:  
Suggested added text, shown as **bolded text** format  
Suggested deleted text, shown as ~~strikethrough~~ format

**Meridian's further submission points are detailed in the attached table**



Friday, March 8, 2024

The Chief Executive  
Greater Wellington Regional Council  
P O Box 11646  
Manners Street  
Wellington 6142

By email: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

Kia ora

**PROPOSED CHANGE 1 TO THE NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION:  
FURTHER SUBMISSIONS OF MERIDIAN ENERGY LIMITED**

I attach the further submissions of Meridian Energy Limited (**Meridian**) on submissions lodged on Proposed Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**).

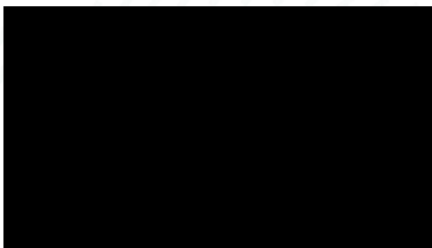
Meridian is a mixed ownership company in which the New Zealand Government retains a majority ownership. Meridian operates two wind farms in the Wellington Region. Meridian's core business of generating, marketing, trading and retailing electricity from renewable sources and the management of assets and ancillary structures for these purposes will be directly affected by the amendments proposed by PC1. Accordingly, Meridian is an entity with an interest in PC1 that is greater than the interest the general public has in PC1.

Meridian's submission points, including requested relief and reasons, are set out in the attached table. I also attach completed Form 6.

Meridian would welcome an opportunity to participate in pre-hearing meetings, including with other submitters, to explore amendments to address the attached submission points.

Please don't hesitate to contact me if there are any matters that you or your Team wish to clarify or to discussion refinements to the proposed District Plan provisions that would address Meridian's requested relief.

Ngā mihi



Andrew Feierabend  
Environmental Manager

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<b>Submission Points Requesting Withdrawal of PC1:</b>			
Meridian supports in part the submissions that seek the withdrawal of PC1 in its entirety.	<p>Including the following submission points:</p> <p>Jo McCready (S94.001)</p> <p>Gillies Group Management Ltd (S161.001)</p> <p>Pukerua Holdings Ltd (S165.001, S165.002, S165.004)</p> <p>Koru Homes NZ Ltd (S169.041, S169.042, S169.043, S169.044, S169.045, S169.046, S169.047, S169.048, S169.049)</p> <p>Arakura Plains Development Ltd (S173.001)</p> <p>Tracy Simms (S175.001)</p> <p>Cuttriss Consultants Ltd (S219.002, S219.004, S219.005)</p> <p>Terawhiti Farming Co Ltd (S224.001, S224.002, S224.003, S224.004, S224.005)</p> <p>Te Kamaru Station Ltd (S229.001, S229.002, S229.003, S229.004, S229.005)</p> <p>Te Marama Ltd (S230.001)</p> <p>Pukerua Property Group Ltd (S241.001, S241.003, S241.004, S241.007, S241.14)</p>	Support in part	<p>Meridian is concerned that proposed PC1 has been promulgated without consultation with all providers of regionally significant infrastructure and without proper consideration of the particular operational and functional needs of regionally significant infrastructure, including Meridian's lawfully established renewable electricity generation wind farms. Proposed PC1 raises potentially significant adverse operational impacts for regionally significant infrastructure, including renewable electricity generation activities, that conflict with the National Policy Statements for Renewable Electricity Generation and Electricity Generation. Proposed PC1 also overrides or upends, without reasonable cause, provisions in the operative NRP for regionally significant infrastructure that were settled by agreement (including the agreement of GWRC) only recently through mediation of appeals on the NRP. Meridian considers that the particular issues of conflict raised in the following submission are capable of resolution by providing appropriate exclusions or exemptions for regionally significant infrastructure (and particularly for lawfully established existing regionally significant infrastructure). These exclusion or exemption provisions are necessary in order for the region's urban and rural communities to function effectively and efficiently, and to enable achievement of the nation's objectives relating to adaptation to climate change. These objectives include enabling increased electricity generation from renewable sources;</p> <p>Decision requested: Allow the submission points and withdraw PC1 or, as alternative relief, make the amendments to PC1 detailed in the following further submission points (or</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p>Land Matters Ltd (S243.033, S243.034)</p> <p>Carrus Corporation Ltd (S247.002, S247.003, S247.004, S247.005)</p> <p>Thames Pacific (S252.002, S252.004, S252.005)</p> <p>Best Farm Ltd (S254.004)</p> <p>Woodridge Holdings Ltd (S255.001)</p>		such further or other relief as will achieve the outcome sought by the submission points).
<b>Definition of 'Earthworks'</b>			
<p><b><u>For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only:</u></b>  <u>The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.</u>  <u>For all other whaitua:</u></p>	<p><b>Horokiwi Quarries S2.009</b></p> <p>Requests reinstatement of the original NRP definition, with the exclusions contained therein and amendment to make them disjunctive using the word 'or' (including for the construction, repair, upgrade or maintenance of pipelines or electricity lines and their support structures, including the national grid and the repair or maintenance of existing roads and tracks and the repair, sealing or resealing of a road or driveway).</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S2.009.</p>
	<p><b>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.001</b></p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking. Earthworks do not include:</p> <p>(a) cultivation of the soil for the establishment of crops or pasture, and</p> <p>(b) the harvesting of crops, and</p> <p>(c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and</p> <p>(d) the construction, repair, upgrade or maintenance of:</p> <p>(i) pipelines, and</p> <p>(ii) electricity lines and their support structures, including the National Grid, and</p> <p>(iii) telecommunication structures or lines, and</p> <p>(iv) radio communication structures, and</p> <p>(v) firebreaks or fence lines, and</p> <p>(vi) a bore or geotechnical investigation bore, and</p> <p>(e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and</p> <p>(f) maintenance of orchards and shelterbelts, and</p> <p>(g) domestic gardening, and</p>	<p>Requests that the exclusions for infrastructure from the operative NRP are carried over into the relevant rules.</p>		<p>electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S41.001.</p>
	<p><b>Fulton Hogan Ltd</b> <b>S43.001</b></p> <p>Opposes the use of different earthworks definitions in different parts of the region. Also proposes deletion of the exemptions currently included in the NRP definition.</p>	Oppose in part	<p>Meridian seeks retention of the exclusions for infrastructure activities. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Disallow the part of S43.001 that seeks deletion of the existing exclusions.</p>
	<p><b>Akatarawa Valley Residents</b> <b>S120.008 S130.008 S140.008</b> <b>S121.008 S131.008 S141.008</b> <b>S122.008 S132.008 S142.008</b> <b>S123.008 S133.008 S143.008</b> <b>S124.008 S134.008 S144.008</b> <b>S125.008 S135.008 S145.008</b> <b>S126.008 S136.008 S146.008</b> <b>S127.008 S137.008 S147.008</b> <b>S128.008 S138.008 S148.008</b> <b>S129.008 S139.008 S149.008</b> <b>S150.008 S160.008 S170.008</b> <b>S161.008 S171.008</b> <b>S152.008 S162.008 S172.008</b> <b>S153.008 S163.008 S173.008</b></p>	Support	<p>The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>(h) repair, sealing or resealing of a road, footpath, driveway, and</p> <p>(i) discharge of cleanfill material to a cleanfill area</p>	<p><b>S154.008 S164.008 S174.008</b>  <b>S155.008 S165.008</b>  <b>S156.008 S166.008</b>  <b>S157.008 S167.008</b>  <b>S158.008 S168.008</b>  <b>S159.008 S169.008</b></p> <p>Oppose deletion of the exclusions for the named Whaitua.</p>		
	<p><b>Wellington Water Ltd</b>  <b>S151.018</b></p> <p>Requests retention of the existing operative plan definition for the whole region (including retention of the exclusions relating to infrastructure activities).</p>	Support in part	<p>Meridian agrees that the removal of the exclusions will result in a large number of consents for minor earthworks activities and will have a significant impact on the ability of infrastructure generally, including regionally significant infrastructure, to repair and maintain networks in a cost effective manner. Meridian considers the listed exclusions should be disjunctive (through use of the expression 'or' instead of 'and' in the list of exclusions);</p> <p>Decision requested: Allow S151.018 in part by retaining the listed exclusions but amend the list by inserting the word 'or' instead of 'and'.</p>
	<p><b>Transpower NZ Limited</b>  <b>S177.009</b></p> <p>Seeks amendment to retain the exclusion from the definition of gardening, cultivation, disturbance for the installation of fenceposts and the construction, repair, upgrade or maintenance of electricity lines and their support structures, including the National Grid.</p>	Support in part	<p>The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusion for the construction, repair, upgrade or maintenance of electricity lines and their support structures as well as for (c) cable or pipe laying, all of the activities listed in operative exclusion clause (d), (e) existing roads and tracks and (h) roads, footpaths and driveways is also important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
			<p>Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S177.009 in part by retaining all of the listed exclusions but amend the list by inserting the word 'or' instead of 'and'.</p>
	<p><b>Wairarapa Federated Farmers S193.021</b></p> <p>Requests retention of the operative definition agreed during mediation of the proposed Natural Resources Plan.</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S193.021.</p>
	<p><b>Winstone Aggregates S206.023</b></p> <p>Seeks inclusion of all of the exemptions provided in the existing NRP definition. Notes use of the word 'and' in the list of exclusions implies all exclusions are conjunctive. Seeks replacement of 'and' with 'or'.</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S206.023.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Rosco Ice Cream Ltd</b> <b>S220.002</b></p> <p>Opposes removal of all reasonable exceptions (other than gardening, cultivation and post holes).</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S220.002.</p>
	<p><b>Upper Hutt City Council</b> <b>S225.032</b></p> <p>Seeks reintroduction of all exclusions.</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S225.032.</p>
	<p><b>Orogen Limited</b> <b>S239.003</b></p> <p>Opposes the removal of exclusions that apply in other Whaitua and requests reinstatement of exclusions (a) to (i), with a new definition and associated set of rules for the excluded activities.</p>	Support in part	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
			<p>2008. Meridian does not agree that a new definition and associated set of rules is required for the excluded activities;</p> <p>Decision requested: Allow S239.003 in part by reinstating exclusions (a) to (i).</p>
	<p><b>Best Farm Ltd</b> <b>S254.005</b></p> <p>Opposes expansion of the definition of 'earthworks' and requests retention of the operative NRP definition.</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S254.005.</p>
	<p><b>S255.009</b> <b>Woodridge Holdings Ltd</b></p> <p>Requests that the definition for all other Whaitua should apply across the entire region.</p>	Support	<p>The operative NRP definition, with including the listed excluded activities, should apply throughout the region. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S255.009.</p>
	<p><b>Goodman Contractors Limited</b> <b>S274.001</b></p>	Support	<p>The operative NRP definition, with including the listed excluded activities, should apply throughout the region. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Requests retention of the operative definition for the entire region.		equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;  Decision requested: Allow S274.001.
	<b>NZTA S275.003</b>  Considers the definition is very confined and will not allow for the construction, repair, upgrade or maintenance of infrastructure. Requests an exclusion to enable construction, repair, upgrade or maintenance of infrastructure where standards are met.	Support in part	Retention of all of the operative exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;  Decision requested: Allow S275.003 by reinstating the list of exclusions (a) to (i) from the operative NRP.
	<b>Civil Contractors New Zealand S285.006</b>  Requests reinstatement of the operative NRP definition.	Support in part	Reinstatement of the exclusions in the operative NRP definition is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008. Meridian takes no position on amendment relating to cleanfills;  Decision requested: Allow S285.006 by reinstating the list of exclusions (a) to (i) from the operative NRP.
<b>Definition of 'Highest erosion risk land (pasture)'</b>			

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<u>Land with highest erosion risk (pasture) in Te Awarua-o-Porirua Whaitua shown on Map 90 or in Whaitua Te Whanganui-a-Tara shown on Map 93.</u>	<b>Horokiwi Quarries Ltd</b> <b>S2.011</b>  Opposes the mapping associated with the definition as it is too high level and has not been substantiated. Requests all mapping is updated with accurate and evidence based mapping or deletion of the definitions (retaining the operative NRP definition of 'erosion prone land'). Also requests that the definition is subject to the Part 1 Schedule 1 process and not the Freshwater Planning Process.	Support in part	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;  Decision requested: Allow S2.011.
	<b>John Easter</b> <b>S17.002</b>  Opposes the definition and considers potential erosion varies and cannot be determined through aerial scanning data. Considers the mapping is not fit for purpose.	Support	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;  Decision requested: Allow S17.002.
	<b>Wairarapa Federated Farmers</b> <b>S193.023</b>  Considers the methodology is not fit for purpose and requests deletion of the definition.	Support	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;  Decision requested: Allow S193.023.
	<b>Winstone Aggregates</b> <b>S206.026</b>  Opposes the mapping associated with the definition as it is too high level and unsubstantiated. Requests deletion of the	Support	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;  Decision requested: Allow S206.026.

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	definition and retention of the existing NRP definition of 'erosion prone land'. Also requests that this amendment is subject to the Part 1 Schedule 1 process and not a Freshwater Planning Process.		
<b>Definition of 'High erosion risk land (pasture)'</b>			
<u>Land with high erosion risk (pasture) in Te Awarua-o-Porirua Whaitua shown on Map 90 or in Whaitua Te Whanganui-a-Tara shown on Map 93.</u>	<p><b>John Easter</b> <b>S17.003</b></p> <p>Opposes the definition and considers potential erosion varies and cannot be determined through aerial scanning data. Considers the mapping is not fit for purpose.</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S17.003.</p>
	<p><b>Wairarapa Federated Farmers</b> <b>S193.024</b></p> <p>Considers the methodology is not fit for purpose and requests deletion of the definition.</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S193.024.</p>
<b>Definition of 'Highest erosion risk land (woody vegetation)'</b>			
<u>Land with highest erosion risk (woody vegetation) in Te Awarua-o-Porirua Whaitua shown on Map 91 or in Whaitua Te Whanganui-a-Tara shown on Map 94.</u>	<p><b>John Easter</b> <b>S17.004</b></p> <p>Opposes the definition and considers potential erosion varies and cannot be determined</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S17.004.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	through aerial scanning data. Considers the mapping is not fit for purpose.		
	<p><b>Wairarapa Federated Farmers S193.025</b></p> <p>Considers the methodology is not fit for purpose and requests deletion of the definition.</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S193.025.</p>
	<p><b>Winstone Aggregates S206.027</b></p> <p>Opposes the mapping associated with the definition as it is too high level and unsubstantiated. Requests deletion of the definition and retention of the existing NRP definition of 'erosion prone land'. Also requests that this amendment is subject to the Part 1 Schedule 1 process and not a Freshwater Planning Process.</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S206.027.</p>
<b>Definition of 'Impervious surfaces'</b>			
<p><u>Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes:</u></p> <ul style="list-style-type: none"> <li>• roofs</li> <li>• paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios,</li> </ul> <p><u>and excludes:</u></p>	<p><b>Transpower NZ Limited S177.012</b></p> <p>Notes access to National Grid transmission lines and structures in rural areas could lead to a requirement for resource consent for routine reconditioning of existing access tracks and create an impediment to the operation and maintenance of the National Grid. Requests</p>	Support	<p>It appears that the proposed rules applying to 'impervious surfaces' may have been intended to only apply to new greenfield urban development, new roads and new state highways. The only mention of 'impervious surfaces' in the Waitua policies is in Policy WH.P14 (stormwater from new greenfield (urban) development and existing urban areas). However, proposed Rules WH.R5, WH.R11, and WH.R12, apply to the creation of new impervious surfaces in both rural and urban environments. There is no policy support for applying these rules in rural environments and the definition</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<ul style="list-style-type: none"> <li>• <u>grassed areas, gardens and other vegetated areas</u></li> <li>• <u>porous or permeable paving</u></li> <li>• <u>slatted decks which allow water to drain through to a permeable surface</u></li> <li>• <u>porous or permeable paving and living roofs</u></li> <li>• <u>roof areas with rainwater collection and reuse</u></li> <li>• <u>any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)</u></li> </ul> <p>It appears that the intention is that the rules related to 'impervious surfaces' were intended to apply only in the urban or urbanised environment (not the rural environment). However, permitted activity Rule WH.R5 limits the area to 1000m<sup>2</sup>, with a default to Rule Wh.R11 captures the creation of new impervious surfaces in either a rural or urban environment. Which requires consent as a discretionary activity, subject to provision of a Stormwater Impact Assessment with the application. Rule WH.R12 captures the creation of new impervious surfaces in either a rural or urban environment that does not comply with the conditions of Rule WH.R11 (i.e. where no Stormwater Impact Assessment is provided) and requires consent as a non-complying activity.</p>	<p>exclusion of access tracks (including vehicular access tracks).</p>		<p>should make this clear (at least in relation to regionally significant infrastructure, including renewable electricity generation, in rural zones). Exclusion of access tracks (including vehicular access tracks) is important to enable the development, operation, maintenance and upgrading of equipment and facilities (including transmission lines and structures) in rural areas that are necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008. The exclusion should be extended to all paved roads and access tracks associated with regionally significant infrastructure, including renewable electricity generation, in the rural environment;</p> <p>Decision requested: Allow S177.012 and amend the definition as follows:</p> <p>by amending the definition as follows:  '...and excludes:</p> <ul style="list-style-type: none"> <li>• grassed areas, gardens and other vegetated areas</li> <li>• <u>access tracks (including vehicular access tracks)</u></li> <li>• <u>any impervious surface associated with regionally significant infrastructure in a district plan rural zone shown on any district plan map</u></li> <li>• porous or permeable paving</li> <li>• slatted decks which allow water to drain through to a permeable surface</li> <li>• porous or permeable paving and living roofs</li> <li>• roof areas with rainwater collection and reuse</li> <li>• any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)...</li> </ul>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>Similarly, permitted activity Rule P.R5 captures the creation of new impervious surfaces in both rural and urban environments and includes conditions that may not be achievable for large impervious surfaces associated with wind farm access roads or car parking areas. Rule P.R10 is the discretionary activity default where the conditions of Rule P.R5 are not met and requires a Stormwater Impact Assessment. Rule P.R11 is the default non-complying activity rule where no Stormwater Impact Assessment is provided.</p> <p>Note – it may be necessary to refine the exclusion from the definition of ‘impervious surfaces’ IF Meridian accepts that it is reasonable to have a permitted activity covering the standards for discharge from high risk industrial or trade premises (which includes substations and switchyards). Just a complication that I don’t think we need to point out yet – just go for the exclusion solution and refine if possible through the hearing process.</p>	<p><b>Horokiwi Quarries Ltd</b> <b>S2.012</b></p> <p>Seeks retention of parts of the definition and an exclusion for impervious surfaces associated with a quarrying activity.</p>	<p>Opposes in part</p>	<p>Meridian is concerned that inclusion of all paved surfaces in the definition (including roads and access tracks integral to or associated with renewable electricity generation facilities in rural areas) will result in unnecessary consent requirements for repair, maintenance and upgrading of paved roads and access tracks within its existing wind farms West Wind and Mill Creek which will not generate the adverse effects of concern under PC1. This will present an unnecessary obstacle to enabling the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S2.012 in part by amending the definition as requested for S177.012.</p>
	<p><b>Wellington City Council</b> <b>S33.012</b></p> <p>Opposes the definition because it is complex and difficult to implement and because the matter is addressed through District Plans as set out in s. 80E of the Act and 3.5 (4) of the NPS-FM.</p>	<p>Support in part</p>	<p>Meridian’s concerns are as stated for S177.012.</p> <p>Decision requested: Allow S33.012 by deleting the definition or by amending the definition as requested for S177.012.</p>
	<p><b>Winstone Aggregates</b> <b>S206.028</b></p> <p>Notes that the intention stated in the s.32 evaluation is to capture urban development and is concerned that would also capture quarrying activities. Seeks retention of parts of the</p>	<p>Oppose in part</p>	<p>Meridian agrees that the PC1 intention appears to have been to only capture urban impervious surfaces. Meridian’s concerns are as stated for S177.012.</p> <p>Decision requested: Allow S206.028 in part by amending the definition as requested for S177.012.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	definition and an exclusion for impervious surfaces associated with a quarrying activity.		
	<p><b>Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust</b> <b>S210.009</b></p> <p>Seeks retention of the definition as publicly notified.</p>	Oppose in part	<p>Meridian's concerns are as stated for S177.012.</p> <p>Decision requested: Allow S210.009 in part by amending the definition as requested for S177.012.</p>
	<p><b>Rosco Ice Cream Ltd</b> <b>S220.005</b></p> <p>Supports the definition, including the exclusions.</p>	Oppose in part	<p>Meridian's concerns are as stated for S177.012.</p> <p>Decision requested: Allow S220.005 in part by amending the definition as requested for S177.012.</p>
	<p><b>Kāinga Ora</b> <b>S257.005</b></p> <p>Seeks retention of publicly notified definition.</p>	Oppose in part	<p>Meridian's concerns are as stated for S177.012.</p> <p>Decision requested: Allow S275.005 in part by amending the definition as requested for S177.012.</p>
	<p><b>The Fuel Companies</b> <b>S258.003</b></p> <p>Seeks retention of the publicly notified definition.</p>	Oppose in part	<p>Meridian's concerns are as stated for S177.012.</p> <p>Decision requested: Allow S258.003 in part by amending the definition as requested for S177.012.</p>
<p><b>Objective O2</b> <b>The importance and contribution of air, land, water and ecosystems to the social, economic and cultural well-being and health of people and the community are recognised in the management of those resources.</b></p>	<p><b>Wellington International Airport Limited</b> <b>S101.018</b></p> <p>Opposes the exclusion of O2 from Whaitua Te Whanganui-a-Tara.</p>	Support	<p>Objective O2 remains relevant for both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. The benefits described in Objective O2 include the benefits of regionally significant infrastructure, including renewable electricity generation which are required to be recognised and provided for by the NPS-REG;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]			Decision requested: Allow S101.018 and retain Objective O2 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.
	<b>Wellington Water Ltd S151.031</b>  Considers the benefits should be recognised regardless of location. Requests retention of Objective O2 for all locations.	Support	The benefits described in Objective O2 should be recognised, regardless of location. The benefits described in Objective O2 include the benefits of regionally significant infrastructure, including renewable electricity generation which are required to be recognised and provided for by the NPS-REG.  Decision requested: Allow S151.031 and retain Objective O2 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.
	<b>Wairarapa Federated Farmers S193.029</b>  Considers Objective O2 is relevant to all Whaitua. Requests retention of Objective O2 for all Whaitua.	Support	The benefits described in Objective O2 should be recognised, regardless of location. The benefits described in Objective O2 include the benefits of regionally significant infrastructure, including renewable electricity generation which are required to be recognised and provided for by the NPS-REG  Decision requested: Allow S193.029 and retain Objective O2 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.
	<b>Civil Contractors NZ S285.012</b>  Considers the benefits should be recognised regardless of location.	Support	The benefits described in Objective O2 should be recognised, regardless of location. The benefits described in Objective O2 include the benefits of regionally significant infrastructure, including renewable electricity generation which are required to be recognised and provided for by the NPS-REG.  Decision requested: Allow S285.012 and retain Objective O2 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b>Objective O6</b>  <b>The social, economic, cultural and environmental benefits of taking and using water are recognised, when managing water.</b></p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p><b>Wellington Water Ltd</b>  <b>S151.033</b></p> <p>Considers it is important that the benefits stated in Objective O6 are recognised. Requests retention of Objective O6 in all locations, with amendment to address stormwater management and wastewater disposal.</p>	Support in part	<p>The benefits described in Objective O6 should be recognised, regardless of location. The benefits described in Objective O2 include the benefits of regionally significant infrastructure.</p> <p>Decision requested: Allow S151.033 and retain Objective O6 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p>
	<p><b>Wairarapa Federated Farmers</b>  <b>S193.031</b></p> <p>Considers Objective O6 is relevant to all Whaitua. Requests retention of Objective O6 for all Whaitua.</p>	Support	<p>The benefits described in Objective O6 should be recognised, regardless of location. The benefits described in Objective O6 include the benefits of regionally significant infrastructure;</p> <p>Decision requested: Allow S193.031 and retain Objective O6 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p>
<p><b>Policy P70: Minimising effects of rural land use activities</b></p> <p>The adverse effects of rural land use activities, including any associated discharge that may enter water, shall be minimised through the use of regulatory and non-regulatory methods that promote, as a minimum, the use of good management practices including:</p> <ul style="list-style-type: none"> <li>(a) rules and methods in the Plan, and</li> <li>(b) development and implementation of farm environment plans, and</li> <li>(c) information gathering, monitoring, assessment and reporting, and</li> <li>(d) integrated catchment management within the Wellington Regional</li> </ul>	<p><b>Wairarapa Federated Farmers</b>  <b>S193.033</b></p> <p>Considers Policy P70 is relevant to all Whaitua and requests retention for all Whaitua.</p>	Support	<p>Meridian agrees Policy P70 remains relevant for all Whaitua;</p> <p>Decision requested: Allow S193.033.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>Council and with the involvement of mana whenua, territorial authorities, water users, farmers, households, industry, environmental groups and technical experts.</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>			
<p><b>Policy P77: Improving water quality for contact recreation and Māori customary use</b></p> <p>The quality of fresh water bodies and coastal water shall be improved to meet, over time and as a minimum, the objectives in Table 3.1, 3.2 and 3.3, including by:</p> <p>(a) improving water quality in all first priority for improvement water bodies for secondary contact with water listed in Schedule H2 (priority water bodies) in accordance with Method M34, and</p> <p>(b) having particular regard to improving water quality in fresh water bodies and coastal water where contact recreation and/or Māori customary use are adversely affected by discharges from stormwater networks, stormwater from a port, or</p>	<p><b>Wairarapa Federated Farmers S193.035</b></p> <p>Considers Policy P77 is relevant to all Whaitua and requests retention for all Whaitua.</p>	<p>Support</p>	<p>Meridian agrees Policy P77 remains relevant for all Whaitua;</p> <p>Decision requested: Allow S193.035.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>airport, wastewater networks and wastewater treatment plants.</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>			
<p><b>Policy P84: Managing land use impacts on stormwater</b> Land use, subdivision and development, including stormwater discharges, shall be managed so that runoff volumes and peak flows:</p> <p>(a) avoid or minimise scour and erosion of stream beds, banks and coastal margins, and</p> <p>(b) do not increase risk to human health or safety, or increase the risk of inundation, erosion or damage to property or infrastructure, including by retaining, as far as practicable, pre-development hydrological conditions in new subdivision and development.</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p><b>Wellington International Airport Ltd S101.029</b></p> <p>Opposes the exclusion of Policy P84 from Whaitua Te Whanganui-a-Tara and requests retention in this Whaitua.</p>	Support	<p>Meridian agrees the policy remains relevant for all Whaitua;</p> <p>Decision requested: Allow S101.029 and retain Policy P84 as applicable in all Whaitua.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b>Rule R48 Stormwater from an individual property – permitted activity</b></p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p><b>Wairarapa Federated Farmers S193.038</b></p> <p>Considers Rule R48 is relevant to all Whaitua and requests retention for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for stormwater management and, if Meridian's submission points are accepted, agrees Rule R48 should be retained (in preference) as relevant for all Whaitua;</p> <p>Decision requested: Allow S193.038.</p>
<p><b>Rule R55 All other stormwater – discretionary activity</b></p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p><b>Wellington International Airport Ltd S101.035</b></p> <p>Requests that, if primary relief on the Chapter 8 provisions is not accepted, Rule R55 should not be excluded from applying in Whaitua Te Whanganui-a-Tara. Requests Rule R55 be retained for Whaitua Te Whanganui-a-Tara.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for stormwater management and, if Meridian's submission points are accepted, agrees Rule R55 should be retained (in preference) as relevant for all Whaitua;</p> <p>Decision requested: Allow S101.035 and retain Rule R55 for all Whaitua.</p>
<p><b>Rule R101 – Earthworks permitted activity</b></p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p><b>Wellington International Airport Ltd S101.036</b></p> <p>Requests that, if primary relief on the Chapter 8 provisions is not accepted, Rule R101 should not be excluded from applying in Whaitua Te Whanganui-a-Tara. Requests Rule R101 be retained for Whaitua Te Whanganui-a-Tara.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for stormwater management and, if Meridian's submission points are accepted, agrees Rule R101 should be retained (in preference) as relevant for all Whaitua;</p> <p>Decision requested: Allow S101.036 and retain Rule R101 for all Whaitua.</p>
	<p><b>Transpower NZ Limited S177.015</b></p> <p>Requests that Rule R101 continues to apply in all Whaitua because the proposed Whaitua rules do not provide any permitted activity threshold for earthworks less than 3000m<sup>2</sup> and R101</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R101 should remain for all Whaitua;</p> <p>Decision requested: Allow S177.015 and retain Rule R101 for all Whaitua.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	provides reasonable conditions for smaller scale earthworks.		
	<p><b>Wairarapa Federated Farmers S193.039</b></p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R101 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R101 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.039 and retain Rule R101 for all Whaitua.</p>
	<p><b>Department of Corrections S248.019</b></p> <p>Requests that Rule R101 continues to apply in all Whaitua because the proposed Whaitua rules do not provide any permitted activity threshold for earthworks less than 3000m<sup>2</sup> and R101 provides reasonable conditions for smaller scale earthworks.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R101 should remain for all Whaitua;</p> <p>Decision requested: Allow S248.019 and retain Rule R101 for all Whaitua.</p>
<p><b>Rule R102 – Construction of a new farm track – permitted activity</b></p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p><b>Wairarapa Federated Farmers S193.040</b></p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R102 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R102 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.040 and retain Rule R102 for all Whaitua.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b>Rule R103 – Construction of a new farm track – controlled activity</b></p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p><b>Wairarapa Federated Farmers S193.041</b></p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R103 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian’s submission points are accepted, agrees Rule R103 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.041 and retain Rule R103 for all Whaitua.</p>
<p><b>Rule R104 – Vegetation clearance on erosion prone land – permitted activity</b></p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p><b>Wairarapa Federated Farmers S193.042</b></p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R104 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for vegetation clearance and, if Meridian’s submission points are accepted, agrees Rule R104 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.042 and retain Rule R104 for all Whaitua.</p>
<p><b>Rule R105 – Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity</b></p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p><b>Wairarapa Federated Farmers S193.043</b></p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R105 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for vegetation clearance and, if Meridian’s submission points are accepted, agrees Rule R105 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.043 and retain Rule R105 for all Whaitua.</p>
<p><b>Rule R106 – Earthworks and vegetation clearance for renewable energy generation – restricted discretionary activity</b></p>	<p><b>Taumata Arowai S116.018</b></p>	Support in part	<p>Meridian agrees amendment to reflect legislative change is appropriate and considers Rule R106 remains relevant for all Whaitua (with the amendment Taumata Arowai proposes);</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]	Seeks amendment to provisions to reflect legislative changes re what constitutes a drinking water supply.		Decision requested: Allow S116.018 by retaining Rule R106 for all Whaitua, amended as proposed by R116.018.
<b>Rule R107 – Earthworks and vegetation clearance - discretionary activity</b>  [NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]	<b>Wellington International Airport Ltd S101.037</b>  Requests that, if primary relief on the Chapter 8 provisions is not accepted, Rule R107 should not be excluded from applying in Whaitua Te Whanganui-a-Tara. Requests Rule R107 be retained for Whaitua Te Whanganui-a-Tara.	Support	Meridian opposes aspects of the Whaitua-specific rules for earthworks and vegetation clearance and, if Meridian's submission points are accepted, agrees Rule R107 should be retained (in preference) as relevant for all Whaitua;  Decision requested: Allow S101.037 and retain Rule R107 for all Whaitua.
	<b>Wairarapa Federated Farmers S193.044</b>  Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R107 is retained for all Whaitua.	Support	Meridian opposes aspects of the Whaitua-specific rules for vegetation clearance and, if Meridian's submission points are accepted, agrees Rule R107 should remain for all Whaitua;  Decision requested: Allow S193.044 and retain Rule R107 for all Whaitua.

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<b>Chapter 8 Proposed Provisions for Whaitua Te Whanganui-a-Tara:</b>			
<p><b>Objective WH.O1</b>  <u>The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.</u></p> <p><b>Note</b> In the wai ora state:  <ul style="list-style-type: none"> <li>• <u>Āhua (natural character) is restored and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character</u></li> <li>• <u>All freshwater bodies have planted margins</u></li> <li>• <u>All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species</u></li> <li>• <u>Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuiri and to exercise manaakitanga</u></li> <li>• <u>Mana whenua are able to undertake customary practices at a range of places throughout the catchment.</u></li> </ul> </p>	<p><b>Transpower NZ Ltd</b>  <b>S177.018</b></p> <p>Supports progressive improvement but does not consider restoration of natural character of all freshwater bodies and coastal marine area can be reasonably achieved where there is existing RSI located over or within freshwater bodies or the coastal marine area, if the objective is read as meaning that infrastructure must be removed. Considers the objective should acknowledge complete restoration of character may not be possible in all instances as relates to RSI. Requests insertion of 'Āhua (natural character) is restored <b>to the extent that this is possible,</b>'</p>	Support in part	<p>Meridian agrees the objective should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S177.018 by inserting the words '...is restored <b>to the extent practicable,</b>'</p>
	<p><b>Winstone Aggregates</b>  <b>S206.032</b></p> <p>Request amendment:</p> <p>'Objective WH.O1 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100. Note In the wai ora state: Āhua (natural character) is restored <b>where it has been degraded</b> and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and</p>	Support	<p>Meridian agrees the objective should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S206.032.</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p>character <b>All</b>-freshwater bodies have planted margins <b>as far as practicable...</b>'</p> <p>Also queries the note and, in particular, whether the expectation that all freshwater bodies have planted margins is possible.</p>		
	<p><b>Hutt City Council</b> <b>S211.006</b></p> <p>Supports the long term vision towards full restoration but seeks clarification of whether the note is part of the objective or an advisory note. Considers it is not physically possible for all water bodies to have planted margins, therefore seeks insertion of 'where possible'.</p>	Support in part	<p>Meridian agrees the objective should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S211.006 by inserting the words '<b>...where practicable,</b>'.</p>
	<p><b>Environmental Defence Society</b> <b>S222.022</b></p> <p>Requests deletion of the word 'note' – so that the specifications of what constitutes 'wai ora' is included in the objective. Also seeks amendment of the target date from 2100 to 2050.</p>	Oppose	<p>The shortened time frame is not practicably achievable. If the objective is to specify what constitutes 'wai ora' the wording needs to be refined to reflect practicability particularly where existing infrastructure, including regionally significant infrastructure, means it is not practicable to plant river margins or to completely restore natural character;</p> <p>Decision requested: Disallow S222.022.</p>
	<p><b>Minister of Conservation</b> <b>S245.001</b></p> <p>Supports the objective but questions the achievability of having planted margins in all waterbodies. Seeks amendment: "All freshwater bodies have vegetated margins <b>where practicable.</b>"</p>	Support	<p>Meridian agrees that there will be situations where planted margins are not achievable (for example, due to the presence of lawfully established infrastructure);</p> <p>Decision requested: Allow S245.001 and clarify whether the note to Objective WH.O1 is intended as an advisory note or as part of the objective.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Kāinga Ora S257.010</b></p> <p>Supports the proposed objectives but notes that some objectives would be difficult to achieve. Seeks amendment to align with but not go beyond NPS-FM.</p>	Support in part	<p>Meridian agrees that some of the outcomes detailed in the note to the objective will be difficult to achieve;</p> <p>Decision requested: Allow S257.010 in part by inserting 'where practicable' into the first two bullet points and clarifying whether the note to Objective WH.O1 is intended to be an advisory note or part of the objective.</p>
	<p><b>Forest &amp; Bird S261.049</b></p> <p>Considers the explanation of 'wai ora' should be part of the objective and that 2100 is too far away. Seeks addition of ephemeral watercourses and deletion of the word 'note'. Also requests amendment of time frame to 2050 or FMU-specific time frames set according to the ease or difficulty of achieving the target attribute states there.</p>	Opposes	<p>The shortened time frame is not practicably achievable. If the objective is to specify what constitutes 'wai ora' the wording needs to be refined to reflect practicability particularly where existing infrastructure, including regionally significant infrastructure, means it is not practicable to plant river margins or the completely restore natural character;</p> <p>Decision requested: Disallow S261.049.</p>
	<p><b>Taranaki Whānui S286.018</b></p> <p>Supports full restoration of Te Whanganui-a-Tara's waterways to wai ora. Considers it is unclear if the text of the 'note' forms part of the objective. Requests deletion of the word 'note'.</p>	Oppose in part	<p>Meridian agrees that the purpose of the note should be clarified but also considers that, as worded, some of the outcomes detailed in the note will be difficult to achieve, particularly where lawfully-established infrastructure, including regionally significant infrastructure, is present;</p> <p>Decision requested: Allow S286.018 in part by inserting 'where practicable' into the first two bullet points and clarifying whether the note to Objective WH.O1 is intended to be an advisory note or part of the objective.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b><u>Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives</u></b>  <u>Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</u></p> <p>(a) <u>prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</u></p> <p>(b) <u>encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</u></p> <p>(c) <u>imposing hydrological controls on urban development and stormwater discharges to rivers</u></p> <p>(d) <u>requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</u></p> <p>(e) <u>stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</u></p> <p>(f) <u>requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</u></p>	<p><b>Wairarapa Federated Farmers S193.068</b></p> <p>Requests deletion of (g) and (h).</p>	Support in part	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its West Wind and Mill Creek wind farms because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S193.068 in part by deleting the reference to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p><b>Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust S210.025</b></p> <p>Requests, either, deletion of clause (g) or amendment to read:</p> <p>'(g) <b><u>adopting best practice principles and management of</u></b> soil conservation treatment, <b><u>including revegetation with woody vegetation</u></b> of land with high erosion risk,'</p>	Support in part	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its West Wind and Mill Creek wind farms because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S210.025 in part by deleting the reference to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p><b>Environmental Defence Society S222.035</b></p> <p>Requests amendment of (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities.</p>	Oppose	<p>The amendment is not necessary. Avoidance of significant adverse effects will be a subset of 'active management' of these activities, determined according to the circumstances;</p> <p>Decision requested: Disallow S222.035.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>(g) <u>soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</u></p> <p>(h) <u>requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</u></p>			
<p><b><u>Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion</u></b>  <u>Reduce discharges of sediment from farming activities on high erosion risk land and highest erosion risk land by:</u></p> <p>(a) <u>identifying highest erosion risk land (pasture) and high erosion risk land (pasture), and</u></p> <p>(b) <u>requiring that farm environment plans prepared for farms with highest erosion risk land (pasture) and/or high erosion risk land (pasture) include an erosion risk treatment plan, and</u></p> <p>(c) <u>ensuring erosion risk treatment plans:</u></p> <p>(i) <u>deliver permanent woody vegetation cover on at least 50% of highest risk erosion land (pasture) that is in pasture on a farm within 10 years and</u></p>	<p><b>Louise Askin S9.017</b></p> <p>Considers woody vegetation is only one option for land treatment and is a challenge to establish in exposed Makara/Ohariu areas. Notes Meridian does not allow revegetation with plants over 1m on many ridgelines across several of the largest local farms due to their disruption of wind flow.</p> <p>Considers working alongside Meridian's windfarm an additional challenge where afforestation needs to be designed to not impede wind flow. Opposes clause ( c ) in particular.</p>	Support	<p>A requirement to establish woody vegetation within existing lawfully established wind farms has the potential to disrupt wind flows, has the potential to impede the maintenance, repair and upgrading of established wind farms and conflicts with the objectives and policies of the NPS-REG;</p> <p>Decision requested: Allow S9.017 and delete clause ( c ) (i).</p>
	<p><b>Louise Askin S9.018</b></p> <p>Concerned that applying the map at property scale will create significant cost to landowners. Considers that on-farm actions need to be based on farm-scale assessment of erosion</p>	Support in part	<p>Consideration of erosion risk from rural land should be based on farm-scale assessment and should include consideration of all of the land use activities present and the impact of mitigation measures on those. For example, the deleterious impact of requiring re-vegetation with woody vegetation on the operation of lawfully established wind farms;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>appropriate erosion control treatment for the remaining highest risk erosion land (pasture) and high erosion risk land (pasture) that is in pasture on the farm, and</u></p> <p>(ii) <u>identify and respond to risks of sediment loss on high erosion risk land (pasture) associated with grazing livestock, earthworks or vegetation clearance, by using effective erosion control treatment, and</u></p> <p>(d) <u>Wellington Regional Council providing support to landowners to implement erosion risk treatment plans.</u></p>	<p>risks. Requests amendment to focus on identify sediment sources rather than solely erosion risk.</p>		<p>Decision requested: Allow S9.018 and replace reference to the mapping of ‘highest erosion risk land (pasture)’ and ‘high erosion risk land (pasture)’ with reference to identifying highest erosion risk at a farm scale.</p>
	<p>John Easter S17.016</p> <p>The mapped erosion areas should be used to how areas which are subject to further investigation and should be labelled indicative to assist with interpretation and not be part of the plan change.</p>	<p>Support in part</p>	<p>Meridian is concerned at the farm-scale accuracy (or inaccuracy) of the mapping and the impact of the rules associated with the mapping;</p> <p>Decision requested: Allow S17.016 and amend the status of the plans to indicative.</p>
	<p><b>Fenaughty Partnership – Riu Huna Farm S39.015 and S39.017</b></p> <p>Concerned about the accuracy of the modelled scenarios that might not include accurate analysis of soil types and is at a coarse scale that is not fit for purpose for Makara/Ohariu. Requests removal of the requirement for re-vegetation and, instead, reliance on bespoke actions and timeframes identified through farm-scale assessment. Also concerned about re-vegetation projects alongside Meridian’s wind farms because afforestation needs to be designed to not impede wind flow. Requests removal of the blanket approach (to be replaced by bespoke actions and timeframes identified through farm-scale assessment).</p>	<p>Support in part</p>	<p>Meridian also has concerns about the accuracy (or inaccuracy) of the mapping a farm scale and about the impact of the rules associated with the mapping. Meridian agrees that farm-scale assessment should be undertaken, including of mitigation measures to ensure they do not conflict with existing lawfully established activities such as wind farms;</p> <p>Decision requested: Allow S39.015 and s39.017 in part by deleting clause ( c ) (i).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Makara and Ohariu large farms S51.009</b></p> <p>Concerned about potential conflict between re-vegetation with woody vegetation and nearby wind farms. Requests removal of clause ( c ) (to be replaced by bespoke actions and timeframes identified through farm-scale assessment).</p>	Support in part	<p>Meridian opposes a requirement for re-vegetation with woody vegetation in close proximity to wind turbines where the vegetation could impede wind flow and could become an obstacle to the maintenance, repair and upgrading of lawfully-established wind farms. Meridian agrees that farm-scale assessment should be undertaken, including of mitigation measures to ensure they do not conflict with existing lawfully established activities such as wind farms;</p> <p>Decision requested: Allow S51.009 in part by deleting clause ( c ) (i).</p>
	<p><b>Terawhiti Farming Co. Ltd S224.012</b></p> <p>Concerned about potential conflict between re-vegetation and nearby wind farms. Considers that the modelling is inaccurate and that retirement of farmland should not be required where there are no erosion issue. Requests removal of blanket approach (to be replaced by bespoke actions and timeframes identified through farm-scale assessment).</p>	Support	<p>Meridian opposes a requirement for re-vegetation with woody vegetation in close proximity to wind turbines where the vegetation could impede wind flow and could become an obstacle to the maintenance, repair and upgrading of lawfully-established wind farms. Meridian agrees that farm-scale assessment should be undertaken, including of mitigation measures to ensure they do not conflict with existing lawfully established activities such as wind farms;</p> <p>Decision requested: Allow S224.012 by deleting clause ( c ) (i).</p>
	<p><b>Te Kamaru Station Ltd S229.012</b></p> <p>Concerned about the challenge to re-vegetation working alongside Meridian's wind farms (which cross six of the submitter's farms) where afforestation needs to be designed to not impede wind flow.</p>	Support	<p>Meridian opposes a requirement for re-vegetation with woody vegetation in close proximity to wind turbines where the vegetation could impede wind flow and could become an obstacle to the maintenance, repair and upgrading of lawfully-established wind farms;</p> <p>Decision requested: Allow S229.012 by deleting clause ( c ) (i).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Te Marama Ltd</b> <b>S231.012</b></p> <p>Notes the challenges with the wind farms and revegetation needing not to impede wind flows.</p>	Support	<p>Meridian opposes a requirement for re-vegetation with woody vegetation in close proximity to wind turbines where the vegetation could impede wind flow and could become an obstacle to the maintenance, repair and upgrading of lawfully-established wind farms;</p> <p>Decision requested: Allow S231.012 by deleting clause ( c ) (i).</p>
<p><b><u>Policy WH.P31: Winter shut down of earthworks</u></b> Earthworks over 3,000m<sup>2</sup> in area shall:</p> <p>(a) <u>be shut down from 1st June to 30th September each year, and</u></p> <p>(b) <u>prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).</u></p>	<p><b>Horokiwi Quarries Ltd</b> <b>S2.027</b></p> <p>Opposes Policy WH.P31 in its entirety and requests its deletion.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S2.027 by deleting Policy WH.P31.</p>
	<p><b>P F Olsen Ltd</b> <b>S18.031</b></p> <p>Considers the winter shutdown for earthworks will have significant economic burdens for construction projects and requests deletion of the provision.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S18.031 by deleting Policy WH.P31.</p>
	<p><b>Summerset Group Holdings Ltd</b> <b>S38.010</b></p> <p>Opposes the requirement to seek a non-complying activity resource consent to undertake winter earthworks and requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S38.010 by deleting Policy WH.P31.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Fulton Hogan Ltd</b> <b>S43.013</b></p> <p>Considers the policy is onerous and does not recognise that winter earthworks may be feasible depending on other factors. Seeks greater flexibility, provided activities are undertaken in accordance with GWRC ESCP standards and are managed and monitored. Requests amendment by inserting 'unless they can be staged or otherwise undertaken in a manner that avoids adverse effects on water quality'.</p>	Supports and opposes in part	<p>Meridian agrees the blanket approach of the policy is inappropriate, particularly for projects to establish or upgrade regionally significant infrastructure, and considers the policy should be deleted, not amended, because there are other operative policies that already provide for the flexibility proposed by the submitter;</p> <p>Decision requested: Disallow S43.013 by deleting (not amending) Policy WH.P31.</p>
	<p><b>Wellington International Airport Ltd</b> <b>S101.055</b></p> <p>Opposes Policy WH.P31 as it does not provide a consent pathway for large scale infrastructure projects. Requests a stand-alone policy and rule for earthworks associated with the airport or regionally significant infrastructure more broadly or deletion of Policy WH.P31 and reversion to the operative NRP provisions.</p>	Support in part	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S101.055 in part by deleting Policy WH.P31, or by amending the policy to exclude earthworks for the purpose of regionally significant infrastructure.</p>
	<p><b>Gillies Group Management Ltd</b> <b>S161.015</b></p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S161.015 by deleting Policy WH.P31.</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Pukerua Holdings Limited</b> <b>S165.015</b></p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S165.015 by deleting Policy WH.P31.</p>
	<p><b>Koru Homes NZ Limited</b> <b>S169.010</b></p> <p>Opposes non-complying activity status for winter earthworks and notes that large rain events at any time can cause larger pulses of sediment. The current practice for managing winter earthworks with GWRC oversight is sufficient. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S169.010 by deleting Policy WH.P31.</p>
	<p><b>Arakura Plains Development Limited</b> <b>S173.015</b></p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S173.015 by deleting Policy WH.P31.</p>
	<p><b>Transpower NZ Limited</b> <b>S177.027</b></p> <p>Considers the policy is inappropriate as it does not recognise there may be circumstances where earthworks need to occur in order to</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S177.027 by deleting Policy WH.P31.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	provide for safe and efficient operation, maintenance, upgrading or development of regionally significant infrastructure. Requests deletion of Policy WH.P31.		
	<p><b>Wairarapa Federated Farmers S193.091</b></p> <p>Considers the issue is addressed by existing NRP provisions and requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S193.091 by deleting Policy WH.P31.</p>
	<p><b>Hutt City Council S211.017</b></p> <p>Disagrees with the s. 32 evaluation that there is a higher risk of sediment discharge during winter. Large storm events can occur throughout the year. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S211.017 by deleting Policy WH.P31.</p>
	<p><b>RP Mansell, J Mansell &amp; MR Mansell S217.006</b></p> <p>Considers the proposed winter shut down is onerous and unnecessary in light of the other provisions. Notes that high rainfall events can occur during any time of year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S217.006 by deleting Policy WH.P31.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Cuttriss Consultants Ltd</b> <b>S219.012</b></p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S219.012 by deleting Policy WH.P31.</p>
	<p><b>Upper Hutt City Council</b> <b>S225.093</b></p> <p>Concerned the policy reads more like a rule or standard. Requests delete the policy or amend to be a policy rather than a rule or standard.</p>	Support and oppose in part	<p>Meridian opposes the provision as either a policy or a standard or rule;</p> <p>Decision requested: Allow S225.093 by deleting Policy WH.P31.</p>
	<p><b>Orogen Limited</b> <b>S239.004</b></p> <p>Does not support earthworks during the period 1<sup>st</sup> June to 30<sup>th</sup> September being a non-complying activity, however acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.</p>	Support and oppose in part	<p>Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;</p> <p>Decision requested: Allow S239.004 in part by deleting Policy WH.P31.</p>
	<p><b>Pukerua Property Group Ltd</b> <b>S241.014</b></p> <p>Considers the policy is too blunt. Requests withdrawal of PC1 or deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S241.014 by deleting Policy WH.P31.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Land Matters Limited</b> <b>S243.019</b></p> <p>Considers the policy is too blunt. Requests deletion of Policy WH.P31 or amendment to provide for winter works subject to criteria.</p>	Support and oppose in part	<p>Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;</p> <p>Decision requested: Allow S243.019 in part by deleting Policy WH.P31.</p>
	<p><b>Carrus Corporation Ltd</b> <b>S247.012</b></p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S247.012 by deleting Policy WH.P31.</p>
	<p><b>Department of Corrections</b> <b>S248.028</b></p> <p>Considers the policy is inappropriate, there are instances where earthworks are unavoidable at this time and, with careful management, can be undertaken in a manner that avoids, remedies, or mitigates adverse effects. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S248.028 by deleting Policy WH.P31.</p>
	<p><b>Thames Pacific</b> <b>S252.012</b></p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy WH.P31.		Decision requested: Allow S252.012 by deleting Policy WH.P31.
	<p><b>Woodridge Holdings Ltd</b> <b>S255.031</b></p> <p>Considers the policy is not effects based as not every earthworks project over 3000m<sup>2</sup> will have adverse effects at this time. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S255.031 by deleting Policy WH.P31.</p>
	<p><b>Kāinga Ora</b> <b>S257.026</b></p> <p>Opposes Policy WH.P31 and the non-complying rule framework. Considers winter works can be adequately considered as a listed discretionary matter within a RDA rule. Requests deletion of Policy WH.P31 and consequential changes to WH.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S257.026 by deleting Policy WH.P31.</p>
	<p><b>Cannon Point Development Ltd</b> <b>S260.007</b></p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S260.007 by deleting Policy WH.P31.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	justify why this measure is required. Requests deletion of Policy WH.P31.		
	<p><b>NZTA</b> <b>S275.037</b></p> <p>Prohibiting earthworks during the winter period would impose significant constraints on NZTA's essential works construction programme. Requests removal of the winter works control, or provision for a process for winter works approval without the need for consent.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S275.037 by deleting Policy WH.P31.</p>
	<p><b>Taranaki Whānui</b> <b>S286.062</b></p> <p>Considers winter earthworks can be addressed through consent conditions rather than requiring a separate consent. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S286.062 by deleting Policy WH.P31.</p>
<b>Rules for the Whaitua Te Whanganui-a-Tara:</b>			
<p><b><u>Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity</u></b> <u>The discharge of stormwater from an existing high risk industrial or trade premise, that is not a port or airport, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a</u></p>	<p><b>Transpower NZ Ltd</b> <b>S177.031</b></p> <p>Considers the limitation to existing facilities would result in new substations or switchyards being a discretionary activity. Requests deletion of 'existing'. Also requests deletion of 'contaminants' so that the focus is on hazardous substances stored or used on site.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S177.031.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>permitted activity, provided the following conditions are met:</u></p> <p>(a) <u>the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and</u></p> <p>(b) <u>the discharge does not contain wastewater, and</u></p> <p>(c) <u>if the discharge is to land where it may enter groundwater,</u></p> <p>(i) <u>the discharge cannot cause or exacerbate the flooding of any other property, and</u></p> <p>(ii) <u>the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and</u></p> <p>(d) <u>any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or</u></p> <p>(i) <u>there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or</u></p> <p>(ii) <u>the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is</u></p>	<p><b>Firth Industries Limited</b> <b>S207.014</b></p> <p>Considers there will be no difference in effects associated with stormwater discharge from existing or new such premises and both should be provided for. Requests deletion of 'existing' and deletion of 'contaminants' to focus on hazardous substances.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S207.014.</p>
	<p><b>Department of Corrections</b> <b>S248.031</b></p> <p>Considers there will be no difference in effects associated with stormwater discharge from existing or new such premises and both should be provided for. Requests deletion of 'existing' and deletion of 'contaminants' to focus on hazardous substances.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S248.031.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and</u></p> <p>(e) <u>if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed:</u></p> <p>(i) <u>50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or</u></p> <p>(ii) <u>100g/m3 where the discharge enters any other water,</u></p> <p><u>and where the discharge is not via an existing local authority stormwater network the discharge shall also not:</u></p> <p>(f) <u>cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and</u></p> <p>(g) <u>give rise to the following effects beyond the zone of reasonable mixing:</u></p>			



	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>(i) <u>the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or</u></p> <p>(ii) <u>any conspicuous change in the colour, or</u></p> <p>(iii) <u>a decrease in water clarity of more than</u></p> <p>1. <u>20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes),</u> <u>or</u></p> <p>2. <u>30% in any other river, or</u></p> <p>(iv) <u>any emission of objectionable odour, or</u></p> <p>(v) <u>the freshwater is unsuitable for consumption by farm animals,</u> <u>or</u></p> <p>(vi) <u>any significant adverse effects on aquatic life.</u></p> <p><u>Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11</u></p>			

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b><u>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity</u></b>  <u>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met:</u></p> <p>(a) <u>the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m<sup>2</sup> (baseline property existing impervious area as at 30 October 2023) and</u></p> <p>(b) <u>all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof cladding and spouting materials, and</u></p> <p>(c) <u>the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water</u></p>	<p><b>Wellington City Council S33.060</b></p> <p>Considers the consenting framework duplicates consenting requirements. Requests deletion of Rule WH.R5 or amendment to limit its applicability to development that is not connected to local authority stormwater networks.</p>	Support in part	<p>It is apparent from the PC1 policies that this and related rules were intended to focus on the urban environment. The reference in Rule WH.R5 to ‘new’ impervious surfaces captures new paved and sealed surfaces in the rural environment. Meridian reiterates the concerns expressed about the definition of ‘impervious surfaces’ and the application of the rules to impervious surfaces in rural environments. The water quality standards are appropriate but the 1000m<sup>2</sup> area limit is not relevant for regionally significant infrastructure projects on large sites (such as wind farms) in the rural environment;</p> <p>Decision requested: Allow S33.060 in part by limiting the applicability of the rule to development located in urban environments or deleting the 1000m<sup>2</sup> area limit and/or amending the definition of ‘impervious surfaces’ so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p><b>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.003</b></p> <p>Requests an exclusion for new and upgraded telecommunications facilities.</p>	Support	<p>Meridian agrees the rule is not relevant for telecommunications infrastructure and considers the exclusion should also be for all regionally significant infrastructure located in any rural zone. Meridian reiterates the concerns expressed about the definition of ‘impervious surfaces’ and the application of the rules to impervious surfaces in rural environments. The water quality standards are appropriate but the 1000m<sup>2</sup> area limit is not relevant for regionally significant infrastructure projects on large sites (such as wind farms) in the rural environment;</p> <p>Decision requested: Allow S41.003 by excluding new and upgraded telecommunications facilities and regionally</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>body (including via an existing local authority stormwater network):</u></p> <p>(i) <u>for all impervious areas associated with a greenfield development, or</u></p> <p>(ii) <u>for all redeveloped and new impervious areas involving greater than 30m<sup>2</sup> of impervious area of a redevelopment (of an existing urbanised property), and</u></p> <p>(d) <u>the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and</u></p> <p>(e) <u>the discharge does not contain wastewater, and</u></p> <p>(f) <u>the concentration of total suspended solids in the discharge shall not exceed:</u></p> <p>(i) <u>50g/m<sup>3</sup> where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or</u></p> <p>(ii) <u>100g/m<sup>3</sup> where the discharge enters any other water, and</u></p>			significant infrastructure in any rural zone as well as telecommunications facilities and by limiting the applicability of the rule to development located in urban environments or deleting the 1000m <sup>2</sup> area limit and/or amending the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.
	<p><b>Transpower NZ Ltd</b> <b>S177.032</b></p> <p>Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activities under Rules WH.R5, WH.R6 and WH.R7 subject to appropriate conditions. Notes that Rule WH.R11 captures new impervious surfaces at high risk industrial or trade premises (and therefore seeks inclusion of these in Rule WH.R11).</p>	Support in part	Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule WH.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for these. The area limit of 1000m <sup>2</sup> on a per property per 12 month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;
	<p><b>Firth Industries Limited</b> <b>S207.015</b></p> <p>Considers new or redeveloped impervious surfaces for high risk industrial or trade premises should be provided for in this permitted activity rule. Requests amendment to delete the exclusion if high risk industrial or trade premises.</p>	Support in part	Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule WH.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for these. The area limit of 1000m <sup>2</sup> on a per property per 12

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>where the discharge is not via an existing or new local authority stormwater network:</p> <p>(g) <u>the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and</u></p> <p>(h) <u>the discharge shall not give rise to the following effects beyond the zone of reasonable mixing:</u></p> <p>(i) <u>the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (</u></p> <p>(ii) <u>any conspicuous change in the colour, or</u></p> <p>(iii) <u>a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or</u></p> <p>(iv) <u>any emission of objectionable odour, or</u></p> <p>(v) <u>the freshwater is unsuitable for consumption by farm animals, or</u></p> <p>(vi) <u>any significant adverse effects on aquatic life.</u></p>			<p>month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Allow S207.015 but delete the proposed area limit of 1000m<sup>2</sup> per property in any consecutive 12-month period.</p>
	<p><b>Guildford Timber Company Ltd, Silverstream Forest Ltd &amp; Goodwin Estate Trust</b> <b>S210.040</b></p> <p>Opposes the basis for defining the area limit and requests amendment to specify it should apply to an existing or future subdivided lot over a 12 month period.</p>	Oppose	<p>Meridian opposes the 1000m<sup>2</sup> area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Therefore, Meridian opposes the requested amendment that includes the proposed 1000m<sup>2</sup> limit;</p> <p>Decision requested: Disallow the amendment requested by S210.040 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m<sup>2</sup> area limit and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p><b>RP Mansell, AJ Mansell and MR Mansell</b> <b>S217.007</b></p> <p>Requests amendment to the area limit to apply to an existing or future subdivided lot over a 12 month period.</p>	Oppose	<p>Meridian opposes the 1000m<sup>2</sup> area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Therefore, Meridian opposes the requested amendment that includes the proposed 1000m<sup>2</sup> limit;</p> <p>Decision requested: Disallow the amendment requested by S217.007 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m<sup>2</sup> area limit and/or amend the definition of 'impervious surfaces' so that it</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>Note Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.</u></p>			applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.
	<p><b>Upper Hutt City Council S225.098</b></p> <p>Considers the 1000m<sup>2</sup> area limit is small and overly onerous in relation to the Council's routine road maintenance and renewal activities. Requests deletion of the 1000m<sup>2</sup> limit as relates to roads, footpaths/cycleways and driveways.</p>	Support	<p>Meridian agrees the area limit is not relevant, and is onerous, for essential services such as roads, footpaths, driveways and for car parking areas and other large paved areas that are necessary for regionally significant infrastructure;</p> <p>Decision requested: Allow S225.098.</p>
	<p><b>Higgins Contractors Limited S226.012</b></p> <p>Concerned that the 1000m<sup>2</sup> area limit is insufficient and requests an increase (and discusses either a 3000m<sup>2</sup> or % of site size limit).</p>	Oppose in part	<p>Meridian considers the area limit is not relevant, and is onerous, for essential services such as roads, footpaths, driveways and for car parking areas and other large paved areas that are necessary for regionally significant infrastructure. Meridian considers that the area limit should be deleted, not amended, for these infrastructure activities;</p> <p>Decision requested: Allow S226.012 only to the extent that it does not conflict with Meridian's requested relief to delete the area limit in relation to large paved areas that are essential for regionally significant infrastructure in the rural environment.</p>
<p><b>Department of Corrections S248.032</b></p> <p>Considers high risk industrial or trade premises should be provided for as permitted activities under Rule WH.R5. Requests deletion of 'high risk industrial or trade premise'.</p>	Support in part	<p>Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule WH.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for</p>	

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
			<p>these. The area limit of 1000m<sup>2</sup> on a per property per 12 month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Support S248.032 but delete the proposed area limit of 1000m<sup>2</sup> per property in any consecutive 12-month period.</p>
	<p><b>Kāinga Ora S257.028</b></p> <p>Opposes the 1000m<sup>2</sup> area limit because it will impose a considerable regulatory burden and cost not adequately assessed within the s. 32 analysis. Requests the 1000m<sup>2</sup> limit is increased to 5000m<sup>2</sup>.</p>	Oppose in part	<p>Meridian opposes the 1000m<sup>2</sup> area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Meridian considers the limit is not relevant for, and should be deleted, for these activities;</p> <p>Decision requested: Disallow the amendment requested by S257.028 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m<sup>2</sup> area limit and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p><b>Isla Walker S259.002</b></p> <p>Objects to Rule WH.R5, specifically the area limit. Requests an increase in the area.</p>	Oppose in part	<p>Meridian opposes the 1000m<sup>2</sup> area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Meridian considers the limit is not relevant for, and should be deleted, for these activities;</p> <p>Decision requested: Disallow the amendment requested by S259.002 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m<sup>2</sup> area limit</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
			and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.
	<b>Forest &amp; Bird S261.099</b>  Considers greater Council oversight is required. Requests reclassification of activity status to controlled activity.	Oppose	Meridian considers permitted activity for discharges from high risk industrial and trade premises is appropriate and can be managed through conditions in the rule (noting that Meridian opposes the 1000m <sup>2</sup> area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment);  Decision requested: Disallow S261.099.
	<b>China Forest Group Company NZ Ltd S288.063</b>  Considers there is confusion between definitions and their application. Requests clarification that the rule applies to urban and industrial or similar circumstances.	Support	Meridian agrees there is confusion in the provisions (in the policies and in the rules) and requests amendments to the definition of 'impervious surfaces' to exclude regionally significant infrastructure in the rural environment or to limit the applicability of the rule to urban situations or high risk industrial or trade premises;  Decision requested: Allow S288.063.
<b><u>Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity</u></b> <u>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may</u>	<b>Wellington City Council S33.065</b>  Considers the proposed framework will result in consenting overlap with WCC functions. Request deletion of Rule WH.R11.	Support in part	Meridian considers the rule should not apply to regionally significant infrastructure in the rural environment;  Decision requested: Allow S33.065.
	<b>Transpower NZ Ltd S177.035</b>	Support in part	Meridian agrees that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are met:</u></p> <p>(a) <u>the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and</u></p> <p>(b) <u>if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).</u></p>	<p>Considers high risk industrial or trade premises should be provided for as permitted activities. Opposes and seeks deletion of mandatory financial contributions.</p>		<p>WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Allow S177.035 in part by amending Rule WH.R11 as follows:</p> <p>‘The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that <b>does not comply with the conditions of is not permitted by Rules WH.R2, WH.R3, WH.R4 or WH.R5, or is not authorised by a controlled activity under</b> Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are is met...’.</p>
	<p><b>Higgins Contractors Limited</b> <b>S226.015</b></p> <p>Considers the requirement of a full stormwater impact assessment is too onerous for sites greater than 1000m2 in non-urban environments. Requests a new rule to provide for discharges from new or impervious areas other than in urbanised areas as a controlled or restricted discretionary activity, without the requirement to prepare a stormwater impact assessment.</p>	Oppose	<p>Meridian’s opposition is to the extent that such a new rule would require consents for discharges from impervious surfaces associated with regionally significant infrastructure in rural locations;</p> <p>Decision requested: Disallow S226.015 or amend the relief requested to provide for discharges from regionally significant infrastructure in rural environments as permitted activities.</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Department of Corrections S248.035</b></p> <p>Considers high risk industrial or trade premises should be provided for as permitted activities. Opposes and seeks deletion of mandatory financial contributions.</p>	Support in part	<p>Meridian agrees that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Allow S248.035 in part by amending Rule WH.R11 as follows:</p> <p>'The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that <b>does not comply with the conditions of is not permitted by Rule Rules WH.R2, WH.R3, WH.R4 or WH.R5, or is not authorised by a controlled activity under</b> Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are is met...'</p>
	<p><b>The Fuel Companies S258.021</b></p> <p>Considers the discretionary activity provisions is appropriate subject to amendment to provide for source control and/or contaminant management.</p>	Oppose	<p>Meridian considers that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Disallow S258.021 and amend Rule WH.R11 as follows:</p> <p>'The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that <b>does not comply with the conditions of is not permitted by Rule Rules WH.R2, WH.R3, WH.R4 or WH.R5, or is not authorised by a controlled activity under</b> Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are is met...’.
<p><b><u>Rule WH.R12: All other stormwater discharges – non-complying activity</u></b>  <u>The:</u></p> <p>(a) <u>discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or</u></p> <p>(b) <u>discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or</u></p> <p>(c) <u>discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade</u></p>	<p>Transpower NZ Ltd  S177.036</p> <p>Considers the move to non-complying activity status, for minor breaches of rule conditions, is not sufficiently justified in the s. 32 report.  Requests amendment to discretionary activity.</p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Allow S177.036.</p>
	<p><b><u>Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust S210.043</u></b></p> <p>Considers the move to non-complying activity status, for minor breaches of rule conditions, is not sufficiently justified in the s. 32 report.  Requests amendment to discretionary activity and deletion of reference to Rule WH.R13.</p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Allow S210.043.</p>
	<p><b><u>RP Mansell, AJ Mansell &amp; MR Mansell S217.010</u></b></p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
(d) <u>premise that does not meet the conditions of Rule WH.R11, or use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, or a prohibited activity under WH.R13, is a non-complying activity.</u>	Considers discretionary activity status is more appropriate and requests retention of existing (operative NRP) effects management approach for managing stormwater discharges. Requests amendment to discretionary activity status.		Decision requested: Allow S217.010.
	<b>Department of Corrections S248.036</b>  Considers discretionary activity status is more appropriate and requests retention of existing (operative NRP) effects management approach for managing stormwater discharges. Requests amendment to discretionary activity status.	Support	Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;  Decision requested: Allow S248.036.
	<b>Forest &amp; Bird S261.105</b>  Supports Rule WH.R12 and requests retention as notified.	Oppose	Meridian considers the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;  Decision requested: Disallow S261.105.
	<b>KiwiRail Holdings Ltd S279.007</b>  Supports Rule WH.R12 and requests retention as notified.	Oppose	Meridian considers the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;  Decision requested: Disallow S279.007
<b><u>Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity</u></b> <u>Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a</u>	<b>Horokiwi Quarries Ltd S2.034</b>  Considers the rule is limiting because it does not allow for any vegetation clearance of the specified land for most uses. Would prefer	Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>surface water body is a permitted activity provided the following conditions are met:</u></p> <p>(a) <u>the vegetation clearance is:</u></p> <p>(i) <u>to implement an action in the erosion risk treatment plan for the farm, or</u></p> <p>(ii) <u>for the control of pest plants, and</u></p> <p>(b) <u>debris from the vegetation clearance is not placed where it can enter a surface water body.</u></p>	<p>retention of the operative NRP rules. Requests provision for up to 200m<sup>2</sup> vegetation clearance in any consecutive 12 month period.</p>		<p>submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S2.034 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p><b>Transpower NZ Ltd</b> <b>S177.038</b></p> <p>Notes regular vegetation clearance is required to prevent vegetation encroaching on National Grid transmission lines and structures. Requests addition of a clause permitting vegetation clearance of up to 200 m<sup>2</sup> in any consecutive 12 month period or for the purpose of operating or maintaining the National Grid.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S177.038 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p><b>Wairarapa Federated Farmers</b> <b>S193.094</b></p> <p>Requests deletion of Rule WH.R17.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
			<p>of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S193.094 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p><b>Winstone Aggregates S206.056</b></p> <p>Considers the rule is limiting because it does not allow for vegetation clearance of the specified land for most uses. Considers the existing approach of operative NRP Rules R104 to R107 is more fit for purpose. Requests addition of a clause permitting vegetation clearance of up to 200 m<sup>2</sup> in any consecutive 12 month period.</p>	<p>Support in part</p>	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S206.056 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>EDS S222.057</b></p> <p>Requests the rule be made a controlled activity, or amend the standards to avoid sedimentation of receiving waterbodies and the coastal marine area.</p>	Oppose	<p>Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), considers permitted activity status is appropriate. Meridian also considers the limits in operative Rule R104 or an area limit for regionally significant infrastructure consistent with the limits in Rule R104 is appropriate;</p> <p>Decision requested: Disallow S222.057.</p>
	<p><b>Kāinga Ora S257.034</b></p> <p>Generally supports the intent of the rule but seeks a threshold for (other) vegetation clearance as a permitted activity.</p>	Support	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S257.034 by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
			permitted to be cleared to be consistent with operative Rule R104.
	<p><b>Cannon Point Development Ltd S260.013</b></p> <p>Considers requiring consent as a discretionary activity for vegetation clearance of areas less than 200m<sup>2</sup> is onerous and unnecessary. Requests provision for vegetation clearance for other purposes up to 200m<sup>2</sup> in any consecutive 12 month period and for track maintenance.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S260.013 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p><b>Forest &amp; Bird S261.110</b></p> <p>Considers additional standards are required, including area limit of 200m<sup>2</sup> and minimum setback from water bodies.</p>	Oppose in part	<p>For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;</p> <p>Decision requested: Disallow S261.110.</p>
	<p><b>NZTA S275.027</b></p> <p>Notes that there is a need to remove vegetation to provide a safe network. The requirement to</p>	Support	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	obtain consent is overly onerous. Considers there should be permitted activity provision and a restricted discretionary activity default.		<p>of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S275.027 by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p><b>Taranaki Whānui S286.081</b></p> <p>Supports and requests retention as notified.</p>	Oppose	<p>For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;</p> <p>Decision requested: Disallow S286.081.</p>
<p><b><u>Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity</u></b></p> <p><u>Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200m<sup>2</sup> per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the</u></p>	<p><b>Transpower NZ Ltd S177.039</b></p> <p>Notes that NESETA would prevail. Requests amendment to insert a matter of control addressing clearance from the National Grid.</p>	Oppose in part	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP. This would necessitate a consequential change to the threshold area specified in Rule WH.R18;</p> <p>Decision requested: Allow S177.039 only to the extent consistent with Meridian’s requested relief on Rule WH.R17 and amend the area limit to match the area limit of Rule WH.R17 (being the area limit of operative Rule R104), particular for regionally significant infrastructure.</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>application for resource consent under this Rule.</u></p> <p><u>Matters of control</u></p> <p><u>1. The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will not exceed that which occurred from the land prior to the vegetation clearance occurring</u></p> <p><u>2. The area, location and method of vegetation clearance</u></p> <p><u>3. Stabilisation and rehabilitation of the area cleared</u></p> <p><u>4. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan</u></p> <p><u>5. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan</u></p> <p><u>6. The time and circumstances under which the resource consent conditions may be reviewed</u></p>	<p><b>Wairarapa Federated Farmers S193.095</b></p> <p>Requests retention of operative NRP rule and deletion of Rule WH.R18.</p>	Support in part	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate amendment of the threshold area specified in Rule WH.R18;</p> <p>Decision requested: Allow S193.095 by amending Rule WH.R17 to match the limits in operative NRP Rule R104 and make consequential amendments to Rule WH.R18.</p>
	<p><b>Winstone Aggregates S206.057</b></p> <p>Opposes the mapping but supports the rule and requests its retention.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit (in Rule WH.R17) should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule WH.R18;</p> <p>Decision requested: Disallow S206.057.</p>
	<p><b>EDS S222.058</b></p> <p>Requests making the provision for vegetation clearance greater than 200m<sup>2</sup> a restricted discretionary or discretionary activity rule.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule WH.R18. Meridian considers the controlled activity default provision is appropriate;</p> <p>Decision requested: Disallow S222.058, allow general vegetation clearance as a permitted activity with limits matching those in operative Rule R104 and make consequential amendments to Rule WH.R18 to increase the threshold area to match Rule WH.R17.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Kāinga Ora S257.035</b></p> <p>Supports the intent of the rule but considers the 200m<sup>2</sup> threshold too onerous. Requests increasing the area limit before consent is required as a controlled activity</p>	Support and oppose in part	<p>Meridian notes that there is no permitted activity rule currently providing for vegetation clearance for purposes other than those listed in Rule WH.R17. this means that vegetation clearance up to 200m<sup>2</sup> for other purposes requires consent as a discretionary activity. Meridian agrees the 200m<sup>2</sup> limit is unduly onerous and considers it should be increased, particularly for vegetation clearance associated with regionally significant infrastructure, as a permitted activity and that the area should match the area limit of operative NRP Rule R104. Meridian supports the proposed controlled activity provision for vegetation clearance of areas greater than the permitted activity limit (provide the permitted activity limit is increased to match Rule R104).</p> <p>Decision requested: Allow S257.035 by increasing the permitted activity Rule WH.R17 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule WH.R18 to reflect this.</p>
	<p><b>Forest &amp; Bird S261.111</b></p> <p>Considers the inability to refuse consent is inappropriate. Requests amendment to discretionary activity or restricted discretionary activity with 'adverse effects on the environment' as a matter of discretion.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit is too small and should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. Meridian opposes a discretionary activity default approach where the threshold area is currently so small.</p> <p>Decision requested: Disallow S261.111.</p>
	<p><b>NZTA S275.028</b></p>	Support in part	<p>Meridian agrees that permitted activity provision should be made for purposes other than those currently listed in Rule WH.R17. The permitted activity rule should provide for</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Suggests a permitted activity status for vegetation clearance to provide for a safe transport network, subject to performance standards.		vegetation clearance associated with regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;  Requested decision: Allow S275.028 by increasing the permitted activity Rule WH.R17 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule WH.R18 to reflect this.
	<b>KiwiRail Holdings Ltd S279.008</b>  Supports the intent of the rule and requests retention as notified.	Oppose	Meridian considers that permitted activity provision should be made for purposes other than those currently listed in Rule WH.R17. The permitted activity rule should provide for vegetation clearance for all regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;  Requested decision: Disallow S279.008.
	<b>Taranaki Whānui S286.082</b>  Supports the intent of the rule and requests retention as notified.	Oppose	Meridian considers that permitted activity provision should be made for purposes other than those currently listed in Rule WH.R17. The permitted activity rule should provide for vegetation clearance associated with regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;  Requested decision: Disallow S286.082.
<b><u>Rule WH.R19: Vegetation clearance – discretionary activity</u></b>	<b>Wairarapa Federated Farmers S193.096</b>	Support	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<u>Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body that does not comply with one or more of the conditions of Rule WH.R17 or Rule WH.R18 is a discretionary activity.</u>	Requests retention of operative NRP rule and deletion of Rule WH.R19.		Decision requested: Allow S193.096.
	<b>Guildford Timber Company Ltd, Silverstream Forest Ltd and the Goodwin Estate Trust S210.047</b>  Supports Rule WH.R19 and requests its retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;  Decision requested: Disallow S210.047 and reinstate operative NRP Rule R106.
	<b>Forest &amp; Bird S261.112</b>  Supports Rule WH.R19 and requests retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;  Decision requested: Disallow S261.112 and reinstate operative NRP Rule R106.
	<b>KiwiRail Holdings Ltd S279.009</b>  Supports the intent of Rule WH.R19 and requests retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;  Decision requested: Disallow S279.009 and reinstate operative NRP Rule R106.
	<b>Taranaki Whānui S286.083</b>  Supports Rule WH.R19 in principle and requests retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;  Decision requested: Disallow S286.083 and reinstate operative NRP Rule R106.

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b>Rule WH.R23: Earthworks – permitted activity</b> Earthworks is a permitted activity, provided the following conditions are met:</p> <p>(a) <u>the earthworks are to implement an action in the erosion risk treatment plan for the farm, or</u></p> <p>(b) <u>the earthworks are to implement an action in the farm environment plan for the farm, or</u></p> <p>(c) <u>the area of earthworks does not exceed 3,000m<sup>2</sup> per property in any consecutive 12-month period, and</u></p> <p>(d) <u>the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and</u></p> <p>(e) <u>soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and</u></p> <p>(f) <u>the area of earthworks must be stabilised within six months after completion of the earthworks, and</u></p> <p>(g) <u>there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body</u></p>	<p><b>Horokiwi Quarries Ltd</b> <b>S2.037</b></p> <p>Considers the rule should include associated discharges and opposes the inclusion of the restriction in (g) which prevents even minor discharges. Requests amendment to insert associated discharges and delete (g).</p>	Support	<p>Meridian agrees that the chapeau of the rule needs to provide for associated discharges (including discharges of sediment and/or flocculant) and considers that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S2.037.</p>
	<p><b>Wellington City Council</b> <b>S33.071</b></p> <p>Considers clause (g) cannot be met. Requests deletion of (g) and insertion of threshold area for erosion and sediment control measures.</p>	Support	<p>Meridian agrees that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S33.071.</p>
	<p><b>Fulton Hogan Ltd</b> <b>S43.016</b></p> <p>Considers the rule should include associated discharges and requests amendment to clause (g) to insert a 25m<sup>2</sup> threshold area over which no discharge is permitted.</p>	Support and oppose in part	<p>Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and opposes in its entirety clause (g);</p> <p>Decision requested: Allow S43.016 in part by providing for associated discharges in the chapeau to the rule and delete clause (g).</p>
	<p><b>Wellington International Airport Ltd</b> <b>S101.067</b></p> <p>Considers clause (g) is impractical and requests its deletion.</p>	Support	<p>Meridian considers clause (g) is impractical, unachievable and unreasonable;</p> <p>Decision requested: Allow S101.067.</p>
	<p><b>Transpower NZ Ltd</b> <b>S177.041</b></p>	Support	<p>Meridian agrees that the chapeau of the rule needs to provide for associated discharges (including discharges of sediment</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
(h) <u>or the coastal marine area, including via a stormwater network, and erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.</u>	Considers clause (g) is inappropriate as it conflicts with the minor discharges rule. Requests deletion of (g).		and/or flocculant) and considers that clause (g) is unachievable and unreasonable;  Decision requested: Allow S177.041.
	<b>David McKeivitt S190.003</b>  Considers discharge of sediment from earthworks is unavoidable even with sediment controls. Requests amendment of clause (g) to refer to discharge that is not treated by erosion and sediment control measures.	Support in part	Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;  Decision requested: Allow S190.003 by deleting clause (g).
	<b>Winstone Aggregated S206.059</b>  Considers the rule should include associated discharges and requests deletion of clause (g).	Support in part	Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and considers clause (g) is impractical, unachievable and unreasonable;  Decision requested: Allow S206.059.
	<b>Orogen Ltd S239.009</b>  Considers discharge of sediment from earthworks is unavoidable even with sediment controls. Requests amendment of clause (g) to refer to discharge that is not treated by erosion and sediment control measures.	Support in part	Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;  Decision requested: Allow S239.009 by deleting clause (g).

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>The Fuel Companies</b> <b>S258.023</b></p> <p>Considers clause (g) sets a zero tolerance approach and requests amendment to refer to best practice erosion and sediment control measures.</p>	Support in part	<p>Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;</p> <p>Decision requested: Allow S258.023 by deleting clause (g).</p>
	<p><b>NZTA</b> <b>S275.031</b></p> <p>Considers the clause (g) limit of no discharge is unworkable and requests amendment to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place.</p>	Support in part	<p>Meridian agrees that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S275.031 by deleting clause (g).</p>
<p><b><u>Rule WH.R24: Earthworks – restricted discretionary activity</u></b> <u>Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met:</u> (a) <u>the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m<sup>3</sup>, except that, if at the time of</u></p>	<p><b>Horokiwi Quarries Ltd</b> <b>S2.038</b></p> <p>Opposes the direction to avoid earthworks in winter and requests deletion of clause (b) and the related matter of discretion (8).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S2.038.</p>
	<p><b>Summerset Group Holdings Ltd</b> <b>S38.019</b></p> <p>Opposes the requirement to seek a non-complying activity resource consent for winter earthworks.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and should be deleted (and considers the related discretionary matter (8) should also be deleted);</p> <p>Decision requested: Allow S38.019 and delete the related discretionary matter (8).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and</u></p> <p>(b) <u>earthworks shall not occur between 1st June and 30th September in any year.</u></p> <p><u>Matters for discretion</u></p> <p><u>1. The location, area, scale, volume, duration and staging and timing of works</u></p> <p><u>2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation</u></p> <p><u>3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site</u></p> <p><u>4. The proportion of unstabilised land in the catchment</u></p> <p><u>5. The adequacy and</u></p>	<p><b>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.005</b></p> <p>Opposes the restriction on winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and should be deleted together with the related discretionary matter (8) which should also be deleted;</p> <p>Decision requested: Allow S41.005 by deleting clause (b) and the related discretionary matter (8).</p>
	<p><b>Fulton Hogan Ltd S43.017</b></p> <p>Considers there are many instances where earthworks can be undertaken without adverse effects during winter. Requests amendment of clause (b) to provide for winter earthworks in specified circumstances.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and considers it should be deleted together with the related discretionary matter (8) which should also be deleted;</p> <p>Decision requested: Allow S43.017 by deleting clause (b) and the related discretionary matter (8).</p>
	<p><b>Wellington International Airport Ltd S101.068</b></p> <p>Opposes clause (b) and matter of discretion (8) and requests deletion of (b) and (8) in their entirety, with provision for a separate restricted discretionary activity earthworks rule specifically for large scale earthworks for regionally significant infrastructure.</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted. Meridian would support a separate restricted discretionary activity rule for large scale earthworks for regionally significant infrastructure;</p> <p>Decision requested: Allow S101.068.</p>
	<p><b>Wellington Water Ltd S151.100</b></p> <p>Considers provision should be made for an exemption from clause (b) for regionally significant infrastructure to reflect the large</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted. Meridian would support a separate restricted discretionary activity rule for large scale earthworks for regionally significant infrastructure;</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>efficiency of stabilisation devices for sediment control</u></p> <p><b>6. Any adverse effects on:</b></p> <p>(i) <u>groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters)</u></p> <p>(ii) <u>group drinking water supplies and community drinking water supplies</u></p> <p>(iii) <u>mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species</u></p> <p>(iv) <u>the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment</u></p> <p>(v) <u>natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers</u></p>	<p>volume of earthwork that needs to be undertaken.</p>		<p>Decision requested: Allow S151.100.</p>
	<p><b>Gillies Group Management Ltd</b> <b>S161.025</b></p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S161.025 and delete related discretionary matter (8).</p>
	<p><b>Pukerua Holdings Ltd</b> <b>S165.025</b></p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S165.025 and delete related discretionary matter (8).</p>
	<p><b>Koru Homes NZ Ltd</b> <b>S169.020</b></p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S169.020 and delete related discretionary matter (8).</p>
	<p><b>Arakura Plains Development Ltd</b> <b>S173.025</b></p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S173.025 and delete related discretionary matter (8).</p>
<p><b>Transpower NZ Ltd</b> <b>S177.042</b></p> <p>Considers the rule should provide for associated discharges (including discharges of sediment and/or flocculant). Opposes non-complying activity status for winter earthworks and</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S177.042.</p>	

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<u>7. Duration of the consent</u> <u>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period</u> <u>9. Monitoring and reporting requirement</u>	requests deletion of clause (b) and related discretionary matter (8).		
	<b>David McKeivitt</b> <b>S190.004</b>  Opposes the blanket restriction on winter earthworks. Requests amendment to provide for winter earthworks in specified circumstances.	Support in part	Meridian agrees clause (b) is unreasonable and unnecessary;  Decision requested: Allow S190.004 by deleting clause (b) and related discretionary matter (8).
	<b>Wairarapa Federated Farmers</b> <b>S193.101</b>  Requests retention of the operative NRP rule and deletion of Rule WH.R24.	Support in part	Meridian agrees the operative NRP rule framework is preferable and sufficient;  Decision requested: Allow S191.101 in part by deleting clause (b) and related discretionary matter (8).
	<b>Winstone Aggregates Ltd</b> <b>S206.060</b>  Opposes non-complying activity status for winter earthworks. Considers there is insufficient evidence to support this and requests deletion of clause (b) and related discretionary matter (8).	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;  Decision requested: Allow S206.060.
	<b>Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust</b>  <b>S210.052</b>  Opposes the winter shut down period and requests deletion of clause (b).	Support in part	Meridian agrees clause (b) is unreasonable and unnecessary;  Decision requested: Allow S210.052 by deleting clause (b) and related discretionary matter (8).

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Hutt City Council</b> <b>S211.024</b></p> <p>Disagrees with the s. 32 evaluation about the need for winter earthworks restriction. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S211.024 and delete related discretionary matter (8).</p>
	<p><b>RP Mansell, AJ Mansell &amp; MR Mansell</b> <b>S217.012</b></p> <p>Considers the shut down period for winter earthworks is onerous and unnecessary. Requests deletion of winter shut down requirements.</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S217.012 and delete related discretionary matter (8).</p>
	<p><b>Cuttriss Consultants Ltd</b> <b>S219.020</b></p> <p>Opposes the requirement for non-complying activity resource consent to undertake winter earthworks. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S219.020 and delete related discretionary matter (8).</p>
	<p><b>EDS</b> <b>S222.064</b></p> <p>Requests the rule is made a discretionary activity.</p>	Oppose	<p>Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;</p> <p>Decision requested: Disallow S222.064.</p>
	<p><b>Orogen Ltd</b> <b>S239.011</b></p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S239.011 and delete related discretionary matter (8).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Considers non-complying activity status for winter earthworks is inappropriate and requests deletion of clause (b).		
	<p><b>Carrus Corporation Ltd</b> <b>S247.020</b></p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S247.020 and delete related discretionary matter (8).</p>
	<p><b>Department of Corrections</b> <b>S248.042</b></p> <p>Considers the rule should provide for associated discharges (including discharges of sediment and/or flocculant). Opposes non-complying activity status for winter earthworks and requests deletion of clause (b) and related discretionary matter (8).</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S248.042.</p>
	<p><b>Thames Pacific</b> <b>S252.019</b></p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S252.019 and delete related discretionary matter (8).</p>
	<p><b>Woodridge Holdings Ltd</b> <b>S255.039</b></p> <p>Notes that, while there is greater potential for earthworks to have adverse effects in winter, these can be addressed. Also opposes the</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S255.039 and delete related discretionary matter (8).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	proportion of catchment limit. Requests deletion of clause (b).		
	<p><b>Kāinga Ora</b> <b>S257.037</b></p> <p>Opposes condition (b) and the resulting escalation to a non-complying activity. Requests deletion of (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S257.037 and delete related discretionary matter (8).</p>
	<p><b>The Fuel Companies</b> <b>S258.024</b></p> <p>Considers the rule should focus on best practice erosion and sediment control. Requests amendments to this effect but retains proposed clause (b).</p>	Oppose in part	<p>Meridian considers the clause (b) restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Disallow S258.024 in part by deleting clause (b) and related discretionary matter (8).</p>
	<p><b>Cannon Point Development Ltd</b> <b>S260.017</b></p> <p>Opposes the winter shut down restriction and requests deletion of clause (b) and related discretionary matter (8).</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S260.017.</p>
	<p><b>Forest &amp; Bird</b> <b>S261.117</b></p> <p>Requests the rule is reclassified a discretionary activity.</p>	Oppose	<p>Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;</p> <p>Decision requested: Disallow S261.117.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>NZTA</b> <b>S275.032</b></p> <p>Considers the rule needs to be amended to provide the ability for some sediment and/or flocculant discharge.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S275.032 by deleting clause (b) and related discretionary matter (8).</p>
	<p><b>Civil Contractors NZ</b> <b>S285.025</b></p> <p>Strongly opposes and considers the winter earthworks shutdown is inappropriate. Requests amendment of clause (b) to ensure sufficient and appropriate exemptions exist to provide some ability for earthworks where potential sediment can be well managed and controlled. At a minimum, a provision should be added for regionally significant infrastructure.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and agrees there should, at the least, be provision for winter earthworks for regionally significant infrastructure (subject to appropriate conditions). Meridian's preference is that clause (b) and related discretionary matter (8) are deleted;</p> <p>Decision requested: Allow S285.025 by deleting clause (b) and related discretionary matter (8).</p>
	<p><b>Taranaki Whānui</b> <b>S286.088</b></p> <p>Supports the intent of clause (b) but considers this issue can be addressed through consent conditions. Notes that the terms of the winter shut down are a restricted discretionary matter and therefore it does not make sense to escalate to a non-complying activity under Rule WH.R25. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S286.088 by deleting clause (b) and related discretionary matter (8).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b><u>Rule WH.R25: Earthworks – non-complying activity</u></b> Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24 is a non-complying activity.</p>	<p><b>Horokiwi Quarries Ltd</b> <b>S2.039</b></p> <p>Considers the non-complying activity rule is not sufficiently justified in the s. 32 evaluation and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can be managed through consent conditions. Requests amendment to make this default rule a discretionary activity.</p>	Support in part	<p>The non-complying activity status is not the most effective or efficient approach. The potential sedimentation and water contamination issues can be comprehensively addressed through effects based conditions. Meridian considers winter earthworks should be provided for as restricted discretionary activities, subject to conditions. Non-compliance with effects-based conditions should be discretionary activity, not non-complying activity;</p> <p>Decision requested: Allow S2.039 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Fulton Hogan Ltd</b> <b>S43.018</b></p> <p>Considers the non-complying activity status is too restrictive given the number of activities that would be captured under Rule WH.R25. Requests amendment to provide for low level earthworks activities.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate;</p> <p>Decision requested: Allow S43.018 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Wellington International Airport Ltd</b> <b>S101.069</b></p> <p>Notes most of WIAL earthworks activities will be captured by Rule WH.R25. Requests a separate restricted discretionary activity earthworks rule for large scale earthworks that provide for regionally significant infrastructure.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate;</p> <p>Decision requested: Allow S101.069 as alternative relief to providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Transpower NZ Ltd</b> <b>S177.043</b></p> <p>Considers non-complying activity status for minor breaches of rule conditions is inappropriate for earthworks associated with the National Grid. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian agrees non-complying activity status is inappropriate for the scope of breaches contemplated by the rule, for the National Grid and for all regionally significant infrastructure (including renewable electricity generation);</p> <p>Decision requested: Allow S177.043 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Wairarapa Federated Farmers</b> <b>S193.102</b></p> <p>Requests retention of the operative NRP rule and deletion of Rule WH.R25.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate;</p> <p>Decision requested: Allow S193.102 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust</b> <b>S210.053</b></p> <p>Considers non-complying activity status for earthworks that do not comply with Rule WH.R24 is onerous and unnecessary. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian agrees the non-complying activity status is onerous, particularly for earthworks associated with large scale regionally significant infrastructure projects;</p> <p>Decision requested: Allow S210.053 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>RP Mansell, AJ Mansell &amp; MR Mansell</b> <b>S217.013</b></p> <p>Generally supports the effects management approach but considers discretionary activity is</p>	Support in part	<p>Meridian considers winter works should be provided for as restricted discretionary activities, subject to conditions. Non-compliance with effects-based conditions should be discretionary activity, not non-complying activity;</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	more appropriate than non-complying activity status. Requests amendment to discretionary activity.		Decision requested: Allow S217.013 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.
	<p><b>Department of Corrections S248.043</b></p> <p>Considers non-complying activity status for earthworks that do not comply with Rule WH.R24 is onerous and unnecessary. Non-complying activity status for minor breaches of rule conditions is problematic for bundled consents which results in a high degree of uncertainty. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian agrees the non-complying activity status is onerous, particularly for earthworks associated with large scale regionally significant infrastructure projects. Meridian considers winter works should be provided for as restricted discretionary activities, subject to conditions. Non-compliance with effects-based conditions should be discretionary activity, not non-complying activity;</p> <p>Decision requested: Allow S248.043 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Kāinga Ora S257.038</b></p> <p>Opposes the non-complying rule insofar as it relates to winter works. Requests deletion of Rule WH.R25 and provision for winter works as a discretionary matter under Rule WH.R24.</p>	Support in part	<p>Meridian agrees the non-complying activity status is onerous and unnecessary, including for non-compliance with the winter works restriction, and considers the default rule should be discretionary activity;</p> <p>Decision requested: Allow S257.038 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b><u>Rule WH.R30: The use of land for farming activities – discretionary activity</u></b>  <u>The use of land for the farming activities described in Rule WH.R26 or Rule WH.R27, and the associated discharge of contaminants into a surface water body or into or onto land where a contaminant may enter freshwater, that does not meet one or more of the conditions of Rule WH.R26 or Rule WH.R27 is a discretionary activity provided the following conditions are met:</u></p> <p>(a) <u>the most recent Wellington Regional Council monitoring record at the time the application is lodged demonstrates that the concentration of dissolved inorganic nitrogen, dissolved reactive phosphorus, or measure of visual clarity, for the relevant catchment does not exceed the target attribute state at any monitoring site within the relevant part Freshwater Management Unit set out in Table 8.4, and</u></p> <p>(b) <u>if the most recent Wellington Regional Council monitoring record at the time the application is lodged demonstrates that the concentration of Escherichia coli, for the relevant catchment exceeds the target attribute state at any monitoring site</u></p>	<p><b>Wairarapa Federated Farmers S193.108</b></p> <p>Requests deletion of Rule WH.R30.</p>	<p>Support in part</p>	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Allow S193.108 by excluding from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>
	<p><b>GWRC S238.022</b></p> <p>Seeks to correct an error in clause (b): ‘.....the land use change is not to pastoral land use.’</p>	<p>Oppose</p>	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Disallow S238.022 and exclude from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>within the relevant part Freshwater Management Unit set out in Table 8.4, the land use change is not to pastoral land use.</u></p>	<p><b>EDS S222.070</b></p> <p>Supports.</p>	<p>Oppose in part</p>	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Disallow S222.070 and exclude from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>
	<p><b>Forest &amp; Bird S261.124</b></p> <p>Supports and requests retention as notified.</p>	<p>Oppose in part</p>	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Disallow S261.124 and exclude from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Taranaki Whānui S286.095</b></p> <p>Supports and requests retention as notified.</p>	Oppose in part	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Disallow S286.095 and exclude from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>
<p><b><u>Rule WH.R32: Farming activities – non-complying activity</u></b>  <u>Any:</u>            (a) <u>use of land for the activities described in Rule WH.R26 or Rule WH.R27 and the associated discharge of contaminants into a surface water body or into or onto land where a contaminant may enter freshwater, that does not meet one or more of the conditions of Rule WH.R30, or</u>            (b) <u>change in land use described in Rule WH.R31 and the associated discharge of contaminants into a surface water body or into or onto land where a contaminant may enter freshwater that does not meet one or</u></p>	<p><b>Wairarapa Federated Farmers S193.110</b></p> <p>Considers the rule is disproportionate and requests deletion of Rule WH.R32.</p>	Support	<p>Meridian agrees the rule is disproportionate;</p> <p>Decision requested: Allow S193.110.</p>
	<p><b>Forest &amp; Bird S261.126</b></p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Rule WH.R32 is disproportionate;</p> <p>Decision requested: Disallow S261.126.</p>
	<p><b>Taranaki Whānui S286.097</b></p> <p>Supports in principle and requests retention as notified.</p>	Oppose	<p>Rule WH.R32 is disproportionate;</p> <p>Decision requested: Disallow S286.097.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>more of the conditions of Rule WH.R31</u> is a non-complying activity.</p>			
<p><b>Chapter 9 Proposed Provisions for Te Awarua-o-Porirua:</b></p>			
<p><b><u>Objective P.01</u></b>  <u>The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.</u></p> <p><u>Note</u>  <u>In the wai ora state:</u></p> <ul style="list-style-type: none"> <li>• <u>Te Awarua-o-Porirua is a taonga of Ngāti Toa Rangatira and must be respected by others</u></li> <li>• <u>Mauri is restored and waters are in a natural state</u></li> <li>• <u>Ecological health is excellent in freshwater and coastal water environments</u></li> <li>• <u>Rivers flow naturally, with ripples and the river beds are stony</u></li> <li>• <u>Mahinga kai, taonga, mahinga ika and kaimoana species are healthy, abundant, diverse, present across all stages of life, sizeable, and able to be culturally harvested by mana whenua</u></li> <li>• <u>Mahinga kai, taonga, mahinga ika and kai moana species are safe to harvest</u></li> </ul>	<p><b>Transpower NZ Ltd</b> <b>S177.044</b></p> <p>Supports progressive improvement but does not consider restoration of natural character of all freshwater bodies and coastal marine area can be reasonably achieved where there is existing RSI located over or within freshwater bodies or the coastal marine area, if the objective is read as meaning that infrastructure must be removed. Considers the objective should acknowledge complete restoration of character may not be possible in all instances as relates to RSI. Requests insertion of 'Mauri is restored and waters are in a natural state <b>to the extent that this is possible,</b>'.</p>	<p>Support in part</p>	<p>Meridian agrees the policy should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S177.044 by inserting the words '<b>...where practicable,</b>'.</p>
	<p><b>Porirua City Council</b> <b>S240.024</b></p> <p>Supports the 100 year vision towards restoration but considers it is not possible for waters to be in a natural state and suggests a qualifier is needed. Requests insertion of 'Mauri is restored, and waters <b>restored</b> to <del>are in</del> a natural state <b>where possible.</b>'</p>	<p>Support in part</p>	<p>Meridian agrees the policy should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S240.024 by inserting the words 'Mauri is restored, and waters <b>restored</b> to <del>are in</del> a natural state <b>where practicable possible.</b>'</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>and eat or use, including for mana whenua to exercise manaakitanga</u></p> <ul style="list-style-type: none"> <li>• <u>Mana whenua and communities are able to undertake a full range of activities</u></li> <li>• <u>Mana whenua are able to undertake cultural activities and practices</u></li> </ul>	<p><b>Kāinga Ora</b> <b>S257.039</b></p> <p>Supports the proposed objectives but notes that some objectives would be difficult to achieve. Seeks amendment to align with but not go beyond NPS-FM.</p>	<p>Support in part</p>	<p>Meridian agrees that some of the outcomes detailed in the note to the objective will be difficult to achieve;</p> <p>Decision requested: Allow S257.039 in part by amending as requested for S177.044 and S240.024.</p>
<p><b><u>Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives</u></b> <u>Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</u></p> <p>(a) <u>prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</u></p> <p>(b) <u>encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</u></p> <p>(c) <u>imposing hydrological controls on urban development and stormwater discharges to rivers</u></p> <p>(d) <u>requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</u></p>	<p><b>Wairarapa Federated Farmers</b> <b>S193.120</b></p> <p>Requests deletion of (g) and (h).</p>	<p>Support in part</p>	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its Mill Creek wind farm because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S193.120 in part by deleting the reference to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p><b>Willowbank Trustee Ltd</b> <b>S204.002</b></p> <p>Considers land and soil qualities restrict ability to establish woody vegetation. Requests amendment to '...with woody vegetation <b>where practicable to do so</b>'.</p>	<p>Support in part</p>	<p>Meridian notes that land and soil qualities are not the only restriction on the practicability of establishing woody vegetation. Meridian opposes any requirement to re-vegetate with woody vegetation any land within its Mill Creek wind farm because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S204.002 in part by deleting the reference to re-vegetation with woody vegetation or amend the</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p>(e) <u>stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</u></p> <p>(f) <u>requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</u></p> <p>(g) <u>soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</u></p> <p>(h) <u>requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</u></p>		reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.
<p><b><u>Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion</u></b>  <u>Reduce discharges of sediment from farming activities on high erosion risk land and highest erosion risk land by:</u></p> <p>(a) <u>identifying highest erosion risk land (pasture) and high erosion risk land (pasture), and</u></p> <p>(b) <u>requiring that farm environment plans prepared for farms with highest erosion risk land (pasture) and/or high erosion risk land (pasture) include an erosion risk treatment plan, and</u></p>	<p><b>Diane Strugnell</b>  <b>S5.010</b></p> <p>Considers the mapping needs to be accurate at farm scale and that alternative methods should be supported. Requests deletion of clause ( c ) (i) requirement for permanent woody revegetation.</p>	Support	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its Mill Creek wind farm because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S5.010 by deleting the reference in clause (3) to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p><b>Donald Love</b>  <b>S102.001</b></p>	Support in part	Meridian opposes any requirement to re-vegetate with woody vegetation any land within its West Wind and Mill Creek wind farms because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
(c) <u>ensuring erosion risk treatment plans:</u> (i) <u>deliver permanent woody vegetation cover on at least 50% of highest risk erosion land (pasture) that is in pasture on a farm within 10 years and appropriate erosion control treatment for the remaining highest risk erosion land (pasture) and high erosion risk land (pasture) that is in pasture on the farm, and</u> (ii) <u>identify and respond to risks of sediment loss on high erosion risk land (pasture) associated with grazing livestock, earthworks or vegetation clearance, by using effective erosion control treatment, and</u> (d) <u>Wellington Regional Council providing support to landowners to implement erosion risk treatment plans.</u>	<p>Considers only a small percentage of sediment is from highest erosion risk land (pasture). Requests removal of the requirement for revegetation of 50% of land with permanent woody vegetation.</p>		<p>generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S102.001 in part by deleting the reference in clause (3) to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p><b>Wairarapa Federated Farmers S193.133</b></p> <p>Considers the issue is addressed by relief sought on Policy P.P21. Considers Council cannot require revegetation by regulation. Requests deletion of Policy P.P22.</p>	Support in part	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its West Wind and Mill Creek wind farms because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S193.133 in part by deleting the reference in clause (3) to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p><b>Willowbank Trustee Ltd S204.006</b></p> <p>Considers it is not always possible to establish woody vegetation due to differing land qualities. Clause ( c ) (i) should focus on addressing erosion risk in an achievable and appropriate manner, rather than requiring a 'one size fits all'. Requests deletion of requirement for permanent woody vegetation.</p>	Support in part	<p>Meridian notes that land and soil qualities are not the only restriction on the practicability of establishing woody vegetation. Meridian opposes any requirement to re-vegetate with woody vegetation any land within its Mill Creek wind farm because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S204.006 in part by deleting the reference to re-vegetation with woody vegetation or amend the</p>



	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.
<p><b><u>Policy P.P27: Management of earthworks sites</u></b>  <u>The risk of sediment discharges from earthworks shall be managed by:</u></p> <p>(a) <u>requiring retention of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and</u></p> <p>(b) <u>limiting the amount of land disturbed at any time, and</u></p> <p>(c) <u>designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and</u></p> <p>(d) <u>requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in</u></p>	<p><b>Transpower NZ Ltd</b>  <b>S177.051</b></p> <p>Considers the requirement to retain soil and sediment on site does not recognise that soil and sediment may need to be removed from site in a controlled manner as part of works associated with maintenance, upgrading, or development of regionally significant infrastructure. Requests amendments:</p> <p>'The <del>risk</del> <b>adverse effects</b> of sediment discharges from earthworks shall be managed by:</p> <p>(a) <del>requiring retention</del> <b>minimising the uncontrolled loss</b> of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and</p> <p>(b) limiting, <b>where practicable</b>, the amount of land disturbed at any time, and...'</p>	Support	<p>Meridian agrees that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;</p> <p>Decision requested: Allow S177.051.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<u>place and are maintained until the land is stabilised against erosion.</u>	<p><b>Wairarapa Federated Farmers S193.138</b></p> <p>Considers the issue is addressed by existing operative NRP provisions. Requests deletion of Policy P.P27.</p>	Support in part	<p>Meridian considers that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;</p> <p>Decision requested: Allow S193.138 in part by amending Policy P.P27 as requested for S177.051.</p>
	<p><b>Winstone Aggregates S206.074</b></p> <p>Requests amendments:</p> <p>'The <del>risk</del> <b>adverse effects associated with</b> of sediment discharges from earthworks shall be managed by:</p> <p>(a) <del>requiring retention of soil and sediment on the land undertaking earthworks in accordance with using</del> good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in <b>general</b> accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), <del>for the duration of the land disturbance,</del> and</p> <p>(b) <b>where practicable</b>, limiting the amount of land disturbed at any time, and...'</p>	Support	<p>Meridian agrees that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;</p> <p>Decision requested: Allow S206.074 to the extent any amendments are consistent with the relief requested for S177.051.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Department of Corrections S248.050</b></p> <p>Considers the requirement to retain soil and sediment on site does not recognise that soil and sediment may need to be removed from site in a controlled manner as part of works associated with maintenance, upgrading, or development of regionally significant infrastructure. Requests amendments:</p> <p>‘The <del>risk</del> <b>adverse effects</b> of sediment discharges from earthworks shall be managed by:</p> <p>(a) <del>requiring retention</del> <b>minimising the uncontrolled loss</b> of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and</p> <p>(b) limiting, <b>where practicable</b>, the amount of land disturbed at any time, and...’</p>	Support	<p>Meridian agrees that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;</p> <p>Decision requested: Allow S248.050.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b>Policy P.P29: Winter shut down of earthworks</b> Earthworks over 3,000m<sup>2</sup> in area shall:</p> <p>(a) <u>be shut down from 1st June to 30th September each year, and</u></p> <p>(b) <u>prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).</u></p>	<p><b>P F Olsen Ltd</b> <b>S18.057</b></p> <p>Considers the winter shutdown for earthworks will have significant economic burdens for construction projects and requests deletion of the provision.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S18.057.</p>
	<p><b>Christine Stanley</b> <b>S26.016</b></p> <p>Considers the policy does not allow for stabilisation and access track maintenance and requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S26.016.</p>
	<p><b>Summerset Group Holdings Ltd</b> <b>S38.025</b></p> <p>Opposes the requirement to seek a non-complying activity resource consent to undertake winter earthworks and requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S38.025.</p>
	<p><b>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand</b> <b>S41.006</b></p> <p>Considers any winter earthworks can be dealt with through conditions of consent and opposes the requirement for non-complying activity consent for winter earthworks. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S41.006.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Wellington Water Ltd</b> <b>S151.122</b></p> <p>Considers the policy is excessive and requests an exemption for regionally significant infrastructure.</p>	Support in part	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S151.122 by deleting Policy P.P29.</p>
	<p><b>Gillies Group Management Ltd</b> <b>S161.030</b></p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S161.030.</p>
	<p><b>Pukerua Holdings Limited</b> <b>S165.030</b></p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S165.030</p>
	<p><b>Koru Homes NZ Limited</b> <b>S169.025</b></p> <p>Opposes non-complying activity status for winter earthworks and notes that large rain events at any time can cause larger pulses of sediment. The current practice for managing winter</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S169.025.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	earthworks with GWRC oversight is sufficient. Requests deletion of Policy P.P29.		
	<p><b>Arakura Plains Development Limited</b> <b>S173.030</b></p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S173.030.</p>
	<p><b>Transpower NZ Limited</b> <b>S177.053</b></p> <p>Considers the policy is inappropriate as it does not recognise there may be circumstances where earthworks need to occur in order to provide for safe and efficient operation, maintenance, upgrading or development of regionally significant infrastructure. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S177.053.</p>
	<p><b>David McKeivitt</b> <b>S190.006</b></p> <p>Considers the length of proposed winter shut down is too onerous. Requests amendment to provide for a risk-based approach.</p>	Oppose	<p>Meridian considers that the risk-based approach can be achieved through conditions of consent directed by other policies;</p> <p>Decision requested: Allow S190.006 by deleting Policy P.P29.</p>
	<p><b>Wairarapa Federated Farmers</b> <b>S193.140</b></p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Considers the issue is addressed by existing NRP provisions and requests deletion of Policy P.P29.		Decision requested: Allow S193.140.
	<p><b>RP Mansell, J Mansell &amp; MR Mansell S217.023</b></p> <p>Considers the proposed winter shut down is onerous and unnecessary in light of the other provisions. Requests deletion of winter shut down requirements.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S217.023.</p>
	<p><b>Cuttriss Consultants Ltd S219.025</b></p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S219.025.</p>
	<p><b>Orogen Limited S239.012</b></p> <p>Does not support earthworks during the period 1<sup>st</sup> June to 30<sup>th</sup> September being a non-complying activity, however acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.</p>	Support and oppose in part	<p>Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;</p> <p>Decision requested: Allow S239.012 in part by deleting Policy WH.P31.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Porirua City Council</b> <b>S240.060</b></p> <p>Considers large storm events can cause larger pulses of sediment discharges at any time throughout the year. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;</p> <p>Decision requested: Allow S240.060.</p>
	<p><b>Carrus Corporation Ltd</b> <b>S247.025</b></p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S247.025.</p>
	<p><b>Department of Corrections</b> <b>S248.052</b></p> <p>Considers the policy is inappropriate, there are instances where earthworks are unavoidable at this time and, with careful management, can be undertaken in a manner that avoids, remedies, or mitigates adverse effects. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S248.52.</p>
	<p><b>Thames Pacific</b> <b>S252.023</b></p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy P.P29.		Decision requested: Allow S252.023.
	<b>Best Farm Ltd S254.011</b>  Considers it is possible and reasonable to work into June or start in September after a dry winter. Requests deletion of Policy P.P29 or amendment to have more flexibility for winter works.	Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure. Meridian supports deletion, not amendment, of the policy;  Decision requested: Allow S254.011.
	<b>Woodridge Holdings Ltd S255.051</b>  Considers the policy is not effects based as not every earthworks project over 3000m <sup>2</sup> will have adverse effects at this time. Requests deletion of Policy WH.P31.	Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;  Decision requested: Allow S255.051.
	<b>Kāinga Ora S257.054</b>  Opposes Policy WH.P31 and the non-complying rule framework. Considers winter works can be adequately considered as a listed discretionary matter within a RDA rule. Requests deletion of	Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;  Decision requested: Allow S257.054 by deleting Policy P.P29.

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Policy P.P29 and consequential changes to related rule framework		
	<p><b>Goodman Contractors Ltd</b> <b>S274.003</b></p> <p>Considers the restriction will have an economic impact. Considers where sites are low risk, winter work should be able to occur. Seeks amendment to provide a more enabling framework for winter works.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S274.003 by deleting Policy P.P29.</p>
	<p><b>NZTA</b> <b>S275.036</b></p> <p>Prohibiting earthworks during the winter period would impose significant constraints on NZTA's essential works construction programme. Requests removal of the winter works control, or provision for a process for winter works approval without the need for consent.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S275.036 by deleting Policy P.P29.</p>
	<p><b>Civil Contractors NZ</b> <b>S285.031</b></p> <p>Considers the winter shut down is inappropriate as many works may be able to be managed with no adverse effects. Requests amendment to ensure sufficient and appropriate exemptions, at a minimum for regionally significant infrastructure.</p>	Support in part	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S285.031 by deleting Policy P.P29.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b><u>Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity</u></b>  <u>The discharge of stormwater from an existing high risk industrial or trade premise, that is not a port or airport, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a permitted activity, provided the following conditions are met:</u></p> <p>(a) <u>the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and</u></p> <p>(b) <u>the discharge does not contain wastewater, and</u></p> <p>(c) <u>if the discharge is to land where it may enter groundwater,</u></p> <p style="padding-left: 20px;">(i) <u>the discharge cannot cause or exacerbate the flooding of any other property, and</u></p> <p style="padding-left: 20px;">(ii) <u>the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and</u></p> <p>(d) <u>any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or</u></p>	<p><b>Transpower NZ Ltd</b>  <b>S177.057</b></p> <p>Considers the limitation to existing facilities would result in new substations or switchyards being a discretionary activity. Requests deletion of ‘existing’. Also requests deletion of ‘contaminants’ so that the focus is on hazardous substances stored or used on site.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S177.057.</p>
	<p><b>Firth Industries Limited</b>  <b>S207.026</b></p> <p>Considers there will be no difference in effects associated with stormwater discharge from existing or new such premises and both should be provided for. Requests deletion of ‘existing’ and deletion of ‘contaminants’ to focus on hazardous substances.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S207.026.</p>
	<p><b>Department of Corrections</b>  <b>S248.059</b></p> <p>Considers there will be no difference in effects associated with stormwater discharge from existing or new such premises and both should be provided for. Requests deletion of ‘existing’ and deletion of ‘contaminants’ to focus on hazardous substances.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S248.059.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>(i) <u>there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or</u></p> <p>(ii) <u>the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and</u></p> <p>(e) <u>if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed:</u></p> <p>(i) <u>50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or</u></p> <p>(ii) <u>100g/m3 where the discharge enters any other water,</u></p>			

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>and where the discharge is not via an existing local authority stormwater network the discharge shall also not:</u></p> <p>(f) <u>cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and</u></p> <p>(g) <u>give rise to the following effects beyond the zone of reasonable mixing:</u></p> <p>(i) <u>the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or</u></p> <p>(ii) <u>any conspicuous change in the colour, or</u></p> <p>(iii) <u>a decrease in water clarity of more than</u></p> <p>1. <u>20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes),</u> <u>or</u></p> <p>2. <u>30% in any other river, or</u></p> <p>(iv) <u>any emission of objectionable odour, or</u></p> <p>(v) <u>the freshwater is unsuitable for consumption by farm animals,</u> <u>or</u></p> <p>(vi) <u>any significant adverse effects on aquatic life.</u></p>			

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<u>Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to P.R10.</u>			
<p><b><u>Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity</u></b></p> <p><u>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met:</u></p> <p>(a) <u>the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m<sup>2</sup> (baseline property existing impervious area as at 30 October 2023) and</u></p> <p>(b) <u>all new building materials associated with the development shall not</u></p>	<p><b>Wellington City Council S33.110</b></p> <p>Considers the consenting framework duplicates consenting requirements. Requests deletion of Rule P.R5 or amendment to limit its applicability to development that is not connected to local authority stormwater networks.</p>	Support in part	<p>It is apparent from the PC1 policies that this and related rules were intended to focus on the urban environment. The reference in Rule WH.R5 to ‘new’ impervious surfaces captures new paved and sealed surfaces in the rural environment. Meridian reiterates the concerns expressed about the definition of ‘impervious surfaces’ and the application of the rules to impervious surfaces in rural environments. The water quality standards are appropriate but the 1000m<sup>2</sup> area limit is not relevant for regionally significant infrastructure projects on large sites (such as wind farms) in the rural environment;</p> <p>Decision requested: Allow S33.110 in part by limiting the applicability of the rule to development located in urban environments or deleting the 1000m<sup>2</sup> area limit and/or amending the definition of ‘impervious surfaces’ so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p><b>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.007</b></p>	Support	<p>Meridian agrees the rule is not relevant for telecommunications infrastructure and considers the exclusion should also be for all regionally significant infrastructure located in any rural zone. Meridian reiterates the concerns expressed about the definition of ‘impervious surfaces’ and the application of the</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and</u></p> <p>(c) <u>the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network):</u></p> <p>(i) <u>for all impervious areas associated with a greenfield development, or</u></p> <p>(ii) <u>for all redeveloped and new impervious areas involving greater than 30m<sup>2</sup> of impervious area of a redevelopment (of an existing urbanised property), and</u></p> <p>(d) <u>the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and</u></p> <p>(e) <u>the discharge does not contain wastewater, and</u></p> <p>(f) <u>the concentration of total suspended solids in the discharge shall not exceed:</u></p> <p>(i) <u>50g/m<sup>3</sup> where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C</u></p>	<p>Requests an exclusion for new and upgraded telecommunications facilities.</p>		<p>rules to impervious surfaces in rural environments. The water quality standards are appropriate but the 1000m<sup>2</sup> area limit is not relevant for regionally significant infrastructure projects on large sites (such as wind farms) in the rural environment;</p> <p>Decision requested: Allow S41.007 by excluding new and upgraded telecommunications facilities and regionally significant infrastructure in any rural zone as well as telecommunications facilities and by limiting the applicability of the rule to development located in urban environments or deleting the 1000m<sup>2</sup> area limit and/or amending the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p><b>Transpower NZ Ltd</b> <b>S177.058</b></p> <p>Notes that Rule WH.R11 [presumably P.R11] captures new impervious surfaces at high risk industrial or trade premises (and therefore seeks inclusion of these in Rule R11). Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activities under Rules R5, R6 and .R7 subject to appropriate conditions.</p>	<p>Support in part</p>	<p>Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule P.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for these. The area limit of 1000m<sup>2</sup> on a per property per 12 month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Allow S177.058 but delete the proposed area limit of 1000m<sup>2</sup> per property in any consecutive 12-month period.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>(mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or</u></p> <p>(ii) <u>100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network:</u></p> <p>(g) <u>the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and</u></p> <p>(h) <u>the discharge shall not give rise to the following effects beyond the zone of reasonable mixing:</u></p> <p>(i) <u>the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (</u></p> <p>(ii) <u>any conspicuous change in the colour, or</u></p> <p>(iii) <u>a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or</u></p>	<p><b>Firth Industries Limited S207.027</b></p> <p>Considers new or redeveloped impervious surfaces for high risk industrial or trade premises should be provided for in this permitted activity rule. Requests amendment to delete the exclusion if high risk industrial or trade premises.</p>	Support in part	<p>Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule WH.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for these. The area limit of 1000m<sup>2</sup> on a per property per 12 month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Allow S207.027 but delete the proposed area limit of 1000m<sup>2</sup> per property in any consecutive 12-month period.</p>
	<p><b>RP Mansell, AJ Mansell and MR Mansell S217.016</b></p> <p>Requests amendment to the area limit to apply to an existing or future subdivided lot over a 12 month period.</p>	Oppose	<p>Meridian opposes the 1000m<sup>2</sup> area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Therefore, Meridian opposes the requested amendment that includes the proposed 1000m<sup>2</sup> limit;</p> <p>Decision requested: Disallow the amendment requested by S217.016 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m<sup>2</sup> area limit and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>(iv) <u>any emission of objectionable odour, or</u></p> <p>(v) <u>the freshwater is unsuitable for consumption by farm animals, or</u></p> <p>(vi) <u>any significant adverse effects on aquatic life.</u></p> <p><u>Note Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.</u></p>	<p><b>Kāinga Ora</b> <b>S257.058</b></p> <p>Opposes the 1000m<sup>2</sup> area limit because it will impose a considerable regulatory burden and cost not adequately assessed within the s. 32 analysis. Requests the 1000m<sup>2</sup> limit is increased to 5000m<sup>2</sup>.</p>	Oppose in part	<p>Meridian opposes the 1000m<sup>2</sup> area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Meridian considers the limit is not relevant for, and should be deleted, for these activities;</p> <p>Decision requested: Disallow the amendment requested by S257.058 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m<sup>2</sup> area limit and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p><b>Forest &amp; Bird</b> <b>S261.176</b></p> <p>Considers greater Council oversight is required. Requests reclassification of activity status to controlled activity.</p>	Oppose	<p>Meridian considers permitted activity for discharges from high risk industrial and trade premises is appropriate and can be managed through conditions in the rule (noting that Meridian opposes the 1000m<sup>2</sup> area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment);</p> <p>Decision requested: Disallow S261.176.</p>
	<p><b>China Forest Group Company NZ Ltd</b> <b>S288.106</b></p> <p>Considers there is confusion between definitions and their application. Requests clarification that the rule applies to urban and industrial or similar circumstances.</p>	Support	<p>Meridian agrees there is confusion in the provisions (in the policies and in the rules) and requests amendments to the definition of 'impervious surfaces' to exclude regionally significant infrastructure in the rural environment or to limit the applicability of the rule to urban situations or high risk industrial or trade premises;</p> <p>Decision requested: Allow S288.106.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><b><u>Rule P.R10: Stormwater from new and redeveloped impervious surfaces – discretionary activity</u></b>  <u>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are met:</u></p> <p>(a) <u>the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and</u></p> <p>(b) <u>if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).</u></p>	<p><b>Wellington City Council</b>  <b>S33.115</b></p> <p>Considers the proposed framework will result in consenting overlap with WCC functions. Requests deletion of Rule P.R10.</p>	Support in part	<p>Meridian considers the rule should not apply to regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Allow SS33.115.</p>
	<p><b>Transpower NZ Ltd</b>  <b>S177.061</b></p> <p>Considers high risk industrial or trade premises should be provided for as permitted activities. Opposes and seeks deletion of mandatory financial contributions.</p>	Support in part	<p>Meridian agrees that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Allow S177.061 in part by amending Rule P.R10 as follows:</p> <p>'The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that <b>does not comply with the conditions of is not permitted by Rule Rules P.R2, P.R3, P.R4 or P.R5, or is not authorised by a controlled activity under</b> Rule P.R6 or Rule PH.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are is met...'</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Department of Corrections S248.059</b></p> <p>Considers high risk industrial or trade premises should be provided for as permitted activities. Opposes and seeks deletion of mandatory financial contributions.</p>	Support in part	<p>Meridian agrees that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Allow S248.059 in part by amending Rule P.R10 as follows:</p> <p>'The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that <b>does not comply with the conditions of is not permitted by Rule Rules P.R.2, P.R.3, P.R.4 or P.R.5, or is not authorised by a controlled activity under</b> Rule P.R6 or Rule PH.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are is met...'</p>
<p><b><u>Rule P.R11: All other stormwater discharges – non-complying activity</u></b> <b><u>The:</u></b></p> <p>(a) <u>discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or</u></p> <p>(b) <u>discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule P.R3, or a restricted</u></p>	<p><b>Transpower NZ Ltd S177.062</b></p> <p>Considers the move to non-complying activity status, for minor breaches of rule conditions, is not sufficiently justified in the s. 32 report. Requests amendment to discretionary activity.</p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Allow S177.062.</p>
	<p><b>RP Mansell, AJ Mansell &amp; MR Mansell S217.019</b></p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>discretionary activity under Rules P.R.8, or</u></p> <p>(c) <u>discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R.4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R.10, or</u></p> <p>(d) <u>use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule P.R.5, or a controlled activity under Rule P.R.6 or P.R.7, or a discretionary activity under Rule P.R.9, or a prohibited activity under PR.12, is a non-complying activity.</u></p>	<p>Considers discretionary activity status is more appropriate and requests retention of existing (operative NRP) effects management approach for managing stormwater discharges. Requests amendment to discretionary activity status.</p>		<p>Decision requested: Allow S217.019.</p>
	<p><b>Department of Corrections S248.060</b></p> <p>Considers discretionary activity status is more appropriate and requests retention of existing (operative NRP) effects management approach for managing stormwater discharges. Requests amendment to discretionary activity status.</p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Allow S248.060.</p>
	<p><b>Forest &amp; Bird S261.182</b></p> <p>Supports Rule P.R.11 and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Disallow S261.182.</p>
	<p><b>KiwiRail Holdings Ltd S279.019</b></p> <p>Supports Rule P.R.11 and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Disallow S279.019</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b><u>Rule P.R16: Vegetation clearance on highest erosion risk land – permitted activity</u></b>  <u>Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met:</u></p> <p>(a) <u>the vegetation clearance is:</u></p> <p>(i) <u>to implement an action in the erosion risk treatment plan for the farm, or</u></p> <p>(ii) <u>for the control of pest plants, and</u></p> <p>(b) <u>debris from the vegetation clearance is not placed where it can enter a surface water body.</u></p>	<p><b>Transpower NZ Ltd</b>  <b>S177.064</b></p> <p>Notes regular vegetation clearance is required to prevent vegetation encroaching on National Grid transmission lines and structures. Requests addition of a clause permitting vegetation clearance of up to 200 m<sup>2</sup> in any consecutive 12 month period or for the purpose of operating or maintaining the National Grid.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S177.064 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p><b>Wairarapa Federated Farmers</b>  <b>S193.143</b></p> <p>Requests deletion of Rule P.R16.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S193.143 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Winstone Aggregates S206.084</b></p> <p>Considers the rule is limiting because it does not allow for vegetation clearance of the specified land for most uses. Considers the existing approach of operative NRP Rules R104 to R107 is more fit for purpose. Requests addition of a clause permitting vegetation clearance of up to 200 m<sup>2</sup> in any consecutive 12 month period.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S206.084 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p><b>EDS S222.099</b></p> <p>Requests the rule be made a controlled activity, or amend the standards to avoid sedimentation of receiving waterbodies and the coastal marine area.</p>	Oppose	<p>Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), considers permitted activity status is appropriate. Meridian also considers the limits in operative Rule R104 or an area limit for regionally significant infrastructure consistent with the limits in Rule R104 is appropriate;</p> <p>Decision requested: Disallow S222.099.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Best Farm Ltd S254.017</b></p> <p>Haas concerns about the accuracy of the mapping. Considers the limit to 200m<sup>2</sup> for pest control as a controlled activity under Rule P.R17 is too low given earthworks are permitted up to 3000m<sup>2</sup>.</p>	Support	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S254.017 by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p><b>Kāinga Ora S257.062</b></p> <p>Generally supports the intent of the rule but seeks a threshold for (other) vegetation clearance as a permitted activity.</p>	Support	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
			Decision requested: Allow S257.062 by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.
	<b>Forest &amp; Bird S261.187</b>  Considers additional standards are required, including area limit of 200m <sup>2</sup> and minimum setback from water bodies.	Oppose in part	For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;  Decision requested: Disallow S261.187.
	<b>NZTA S275.029</b>  Notes that there is a need to remove vegetation to provide a safe network. The requirement to obtain consent is overly onerous. Considers there should be permitted activity provision and a restricted discretionary activity default.	Support	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;  Decision requested: Allow S275.029 by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.
	<b>KiwiRail Holdings Ltd S279.020</b>	Oppose	For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Supports the intent of the provision and requests retention as notified.		Decision requested: Disallow S279.020.
<p><b><u>Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity</u></b>  <u>Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200m<sup>2</sup> per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the application for resource consent under this Rule.</u></p> <p><u>Matters of control</u>  1. <u>The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will not exceed that which occurred from the land prior to the vegetation clearance occurring</u>  2. <u>The area, location and method of vegetation clearance</u>  3. <u>Stabilisation and rehabilitation of the area cleared</u></p>	<p><b>Transpower NZ Ltd</b>  <b>S177.065</b></p> <p>Notes that NESETA would prevail. Requests amendment to insert a matter of control addressing clearance from the National Grid.</p>	Oppose in part	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP. This would necessitate a consequential change to the threshold area specified in Rule P.R17;</p> <p>Decision requested: Allow S177.065 only to the extent consistent with Meridian’s requested relief on Rule P.R16 and amend the area limit to match the area limit of Rule P.R16 (being the area limit of operative Rule R104), particular for regionally significant infrastructure.</p>
	<p><b>Wairarapa Federated Farmers</b>  <b>S193.144</b></p> <p>Requests retention of operative NRP rule and deletion of Rule P.R17.</p>	Support in part	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate amendment of the threshold area specified in Rule P.R17;</p> <p>Decision requested: Allow S193.144 by amending Rule P.R16 to match the limits in operative NRP Rule R104 and make consequential amendments to Rule P.R17.</p>
	<p><b>Winstone Aggregates</b>  <b>S206.085</b></p> <p>Opposes the mapping but supports the rule and requests its retention.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit (in Rule P.R16) should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule P.R17;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>4. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan</u></p> <p><u>5. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan</u></p> <p><u>6. The time and circumstances under which the resource consent conditions may be reviewed</u></p>			Decision requested: Disallow S206.085.
	<p><b>EDS S222.100</b></p> <p>Requests making the provision for vegetation clearance greater than 200m<sup>2</sup> a restricted discretionary or discretionary activity rule.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule P.R17. Meridian considers the controlled activity default provision is appropriate;</p> <p>Decision requested: Disallow S222.100, allow general vegetation clearance as a permitted activity with limits matching those in operative Rule R104 and make consequential amendments to Rule P.R17 to increase the threshold area to match Rule P.R16.</p>
	<p><b>Porirua City Council S240.075</b></p> <p>Supports and requests retention as notified.</p>	Oppose	<p>For the reasons explained above, Meridian considers Rule P.R17 requires amendment;</p> <p>Decision requested: Disallow S240.075.</p>
	<p><b>Best Farm Ltd S254.018</b></p> <p>Considers the area limit is too low as a controlled activity given that earthworks are permitted up to 3000m<sup>2</sup>.</p>	Support in part	<p>Meridian agrees the controlled activity threshold (and therefore also the permitted activity limit) is too low and considers it should be amended to match the operative NRP rules (R104 and R106 in particular);</p> <p>Decision requested: Allow S254.018 by increasing the permitted activity area limit to match the operative NRP Rule R104 limit and making consequential amendments to Rule P.R17 to reflect this increase.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Kāinga Ora S257.063</b></p> <p>Supports the intent of the rule but considers the 200m<sup>2</sup> threshold too onerous. Requests increasing the area limit before consent is required as a controlled activity</p>	Support and oppose in part	<p>Meridian notes that there is no permitted activity rule currently providing for vegetation clearance for purposes other than those listed in Rule P.R16. This means that vegetation clearance up to 200m<sup>2</sup> for other purposes requires consent as a discretionary activity. Meridian agrees the 200m<sup>2</sup> limit is unduly onerous and considers it should be increased, particularly for vegetation clearance associated with regionally significant infrastructure, as a permitted activity and that the area should match the area limit of operative NRP Rule R104. Meridian supports the proposed controlled activity provision for vegetation clearance of areas greater than the permitted activity limit (provide the permitted activity limit is increased to match Rule R104).</p> <p>Decision requested: Allow S257.063 by increasing the permitted activity Rule P.R16 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule P.R17 to reflect this.</p>
	<p><b>Forest &amp; Bird S261.188</b></p> <p>Considers the inability to refuse consent is inappropriate. Requests amendment to discretionary activity or restricted discretionary activity with 'adverse effects on the environment' as a matter of discretion.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit is too small and should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. Meridian opposes a discretionary activity default approach where the threshold area is currently so small.</p> <p>Decision requested: Disallow S261.188.</p>
	<p><b>NZTA S275.030</b></p> <p>Suggests a permitted activity status for vegetation clearance to provide for a safe</p>	Support in part	<p>Meridian agrees that permitted activity provision should be made for purposes other than those currently listed in Rule P.R16. The permitted activity rule should provide for vegetation clearance associated with regionally significant infrastructure and the limits should match those in operative</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	transport network, subject to performance standards.		NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;  Requested decision: Allow S275.030 by increasing the permitted activity Rule P.R16 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule P.R17 to reflect this.
	<b>KiwiRail Holdings Ltd</b> <b>S279.008</b>  Supports the intent of the rule and requests retention as notified.	Oppose	Meridian considers that permitted activity provision should be made for purposes other than those currently listed in Rule P.R16. The permitted activity rule should provide for vegetation clearance for all regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;  Requested decision: Disallow S279.008.
<b><u>Rule P.R18: Vegetation clearance – discretionary activity</u></b> <u>Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body that does not comply with one or more of the conditions of Rule P.R16 or P.R17 is a discretionary activity.</u>	<b>Wairarapa Federated Farmers</b> <b>S193.145</b>  Requests retention of operative NRP rule and deletion of Rule P.R18.	Support	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;  Decision requested: Allow S193.145.
	<b>Porirua City Council</b> <b>S240.076</b>  Supports and requests retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;  Decision requested: Disallow S240.076 and reinstate operative NRP Rule R106.

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Forest &amp; Bird</b> <b>S261.189</b></p> <p>Supports Rule WH.R19 and requests retention as notified.</p>	Oppose	<p>Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;</p> <p>Decision requested: Disallow S261.189 and reinstate operative NRP Rule R106.</p>
	<p><b>KiwiRail Holdings Ltd</b> <b>S279.022</b></p> <p>Supports the intent of Rule WH.R19 and requests retention as notified.</p>	Oppose	<p>Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;</p> <p>Decision requested: Disallow S279.022 and reinstate operative NRP Rule R106.</p>
<p><b><u>Rule P.R22: Earthworks – permitted activity</u></b> Earthworks is a permitted activity, provided the following conditions are met:</p> <p>(a) <u>the earthworks are to implement an action in the erosion risk treatment plan for the farm, or</u></p> <p>(b) <u>the earthworks are to implement an action in the farm environment plan for the farm, or</u></p> <p>(c) <u>the area of earthworks does not exceed 3,000m<sup>2</sup> per property in any consecutive 12-month period, and</u></p> <p>(d) <u>the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124,</u></p>	<p><b>Wellington City Council</b> <b>S33.121</b></p> <p>Considers clause (g) cannot be met. Requests deletion of (g) and insertion of threshold area for erosion and sediment control measures.</p>	Support	<p>Meridian agrees that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S33.121.</p>
	<p><b>Fulton Hogan Ltd</b> <b>S43.028</b></p> <p>Considers the rule should include associated discharges and requests amendment to clause (g) to insert a 25m<sup>2</sup> threshold area over which no discharge is permitted.</p>	Support and oppose in part	<p>Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and opposes in its entirety clause (g);</p> <p>Decision requested: Allow S43.028 in part by providing for associated discharges in the chapeau to the rule and deleting clause (g).</p>
	<p><b>Jo McCready</b> <b>S94.012</b></p>	Support	<p>Meridian considers that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S94.012 by deleting clause (g).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>R130, R131, R134, R135, and R137, and</p> <p>(e) <u>soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and</u></p> <p>(f) <u>the area of earthworks must be stabilised within six months after completion of the earthworks, and</u></p> <p>(g) <u>there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and</u></p> <p>(h) <u>erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.</u></p>	<p>Considers the conditions are arbitrary with no factual basis. Also considers the size of earthworks had no relation to property size and the weather window is irrelevant (bad weather can occur at any time of year). Requests delete these conditions.</p>		
	<p><b>Wellington Water Ltd</b> <b>S151.130</b></p> <p>Notes earthworks activities undertaken by Wellington Water with minor effects would be unable to meet the permitted activity conditions of proposed Rule WH.R22 including minor repairs and maintenance of three waters infrastructure. Notes that this proposed rule may mean that hundreds of resource consent applications would be required per annum for minor earthworks activities associated with burst pipe repairs. Requests amendment to reinstate the exemptions for certain earthworks as still provided for in other Whaitua.</p>	Support	<p>Meridian agrees the deletion of the operative NRP exemptions is problematic for regionally significant infrastructure;</p> <p>Decision requested: Allow S151.130 to the extent consistent with Meridian's other further submission points.</p>
	<p><b>Transpower NZ Ltd</b> <b>S177.067</b></p> <p>Considers clause (g) is inappropriate as it conflicts with the minor discharges rule. Requests deletion of (g).</p>	Support	<p>Meridian agrees that clause (g) is unachievable and unreasonable and also considers that the chapeau of the rule needs to provide for associated discharges (including discharges of sediment and/or flocculant);</p> <p>Decision requested: Allow S177.067 by deleting (g) and by providing for associated discharges in the chapeau to the rule.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>David McKeivitt</b> <b>S190.007</b></p> <p>Considers discharge of sediment from earthworks is unavoidable even with sediment controls. Requests amendment of clause (g) to refer to discharge that is not treated by erosion and sediment control measures.</p>	Support in part	<p>Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;</p> <p>Decision requested: Allow S190.007 by deleting clause (g).</p>
	<p><b>Wairarapa Federated Farmers</b> <b>S193.149</b></p> <p>Requests deletion of Rule P.R22.</p>	Support in part	<p>Meridian considers the rule should include associated discharges (including discharges of sediment and/or flocculant) and considers clause (g) is impractical;</p> <p>Decision requested: Allow S193.149 in part by providing for associated discharges in the chapeau to the rule and deleting clause (g).</p>
	<p><b>Winstone Aggregated</b> <b>S206.087</b></p> <p>Considers the rule should include associated discharges and requests deletion of clause (g).</p>	Support in part	<p>Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and considers clause (g) is impractical, unachievable and unreasonable;</p> <p>Decision requested: Allow S206.087.</p>
	<p><b>Greater Wellington Regional Council</b> <b>S238.030</b></p> <p>Considers the rule should apply to all earthworks (not just those intended to implement an erosion risk treatment plan).</p>	Oppose in part	<p>Meridian opposes the inclusion of clause (g) in GWRC's requested amendments;</p> <p>Decision requested: Disallow S238.030 in part by deleting clause (g) (re-numbered ( e ) in S238.030).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Best Farm Ltd</b> <b>S254.019</b></p> <p>Considers requiring no discharge of sediment from earthworks is a physical impossibility. Requests deletion of clause (g).</p>	Support	<p>Meridian agrees clause (g) is impractical;</p> <p>Decision requested: Allow S254.019.</p>
	<p><b>The Fuel Companies</b> <b>S258.044</b></p> <p>Considers clause (g) sets a zero tolerance approach and requests amendment to refer to best practice erosion and sediment control measures.</p>	Support in part	<p>Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;</p> <p>Decision requested: Allow S258.044 by deleting clause (g).</p>
	<p><b>NZTA</b> <b>S275.034</b></p> <p>Considers the clause (g) limit of no discharge is unworkable and requests amendment to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place.</p>	Support in part	<p>Meridian agrees that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S275.034 by deleting clause (g).</p>
	<p><b>Civil Contractors NZ</b> <b>S285.032</b></p> <p>Considers many earthworks activities undertaken have significant public benefits but would be unable to comply with the standards of Rule P.R22. Requests amendment to reinstate</p>	Support	<p>Meridian agrees that some of the standards in the rule are impractical or unachievable;</p> <p>Decision requested: Allow S285.032.</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	the exemptions for certain earthwork activities in the operative NRP.		
<p><b><u>Rule P.R23: Earthworks – restricted discretionary activity</u></b>  <u>Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R22 is a restricted discretionary activity, provided the following conditions are met:</u></p> <p>(a) <u>the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m<sup>3</sup>, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m<sup>3</sup>, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:</u></p> <p>(i) <u>20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or</u></p> <p>(ii) <u>30% in any other river, and</u></p>	<p><b>Summerset Group Holdings Ltd S38.034</b></p> <p>Opposes the requirement for non-complying activity resource consent for discharges of sediment over the winter period. Considers large rain events causing larger pulses of sediment can occur at any time. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that the related discretionary matter (8) should also be deleted;</p> <p>Decision requested: Allow S38.034 by deleting clause (b) and discretionary matter (8).</p>
	<p><b>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.009</b></p> <p>Telecommunications works are necessarily carried out year-round. Considers having to apply for consents to undertake these activities during winter will add significant costs and delays in the provision of telecommunication facilities. Winter earthworks should be dealt with through conditions of consent. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that the related discretionary matter (8) should also be deleted;</p> <p>Decision requested: Allow S41.009 by deleting clause (b) and discretionary matter (8).</p>
	<p><b>Fulton Hogan Ltd S43.029 and S43.030</b></p> <p>Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers the rule</p>	Support and oppose in part	<p>Meridian agrees with the reasons for S43.029 and S43.030 but does not agree with the proposed amendment. Meridian also considers the related discretionary matter (8) should also be deleted;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p>(b) <u>earthworks shall not occur between 1st June and 30th September in any year.</u></p> <p><u>Matters for discretion</u></p> <p><u>1. The location, area, scale, volume, duration and staging and timing of works</u></p> <p><u>2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation</u></p> <p><u>3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site</u></p> <p><u>4. The proportion of un stabilised land in the catchment</u></p> <p><u>5. The adequacy and efficiency of stabilisation devices for sediment control</u></p> <p><u>6. Any adverse effects on:</u></p> <p>(i) <u>groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori</u></p>	<p>is out of step with Policy P28 and is more stringent than the policy directs. Concerned with the cost implications for trivial environmental gains. Requests amendment to (b) to provide for small scale earthworks with a site specific winter earthworks plan and retention of prohibition on winter work for earthworks over 3000m<sup>2</sup>.</p>		<p>Decision requested: Disallow S43.029 and S43.030 and delete clause (b) and discretionary matter (8).</p>
	<p><b>Wellington Water Ltd</b> <b>S151.131</b></p> <p>Considers provision should be made for an exemption from clause (b) for regionally significant infrastructure to reflect the large volume of earthwork that needs to be undertaken.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted. Meridian would support a separate restricted discretionary activity rule for large scale earthworks for regionally significant infrastructure;</p> <p>Decision requested: Allow S151.131.</p>
	<p><b>Gillies Group Management Ltd</b> <b>S161.040</b></p> <p>Opposes the requirement for non-complying activity consent for winter earthworks. Notes that large storm events can occur throughout the year. Considers current approach to managing winter earthworks is effective. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.</p> <p>Decision requested: Allow S161.040.</p>
	<p><b>Pukerua Holdings Ltd</b> <b>S165.040</b></p> <p>Opposes the requirement for non-complying activity consent for winter earthworks. Notes</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.</p> <p>Decision requested: Allow S165.040.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>customary use) or Schedule I (important trout fishery rivers and spawning waters)</u></p> <p>(ii) <u>group drinking water supplies and community drinking water supplies</u></p> <p>(iii) <u>maori, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species</u></p> <p>(iv) <u>the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment</u></p> <p>(v) <u>natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers</u></p> <p><u>7. Duration of the consent</u></p> <p><u>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period</u></p> <p><u>9. Monitoring and reporting requirement</u></p>	<p>that large storm events can occur throughout the year. Requests deletion of clause (b).</p>		
	<p><b>Koru Homes NZ Ltd</b> <b>S169.035</b></p> <p>Opposes the requirement for non-complying activity consent for winter earthworks. Notes that large storm events can occur throughout the year. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.</p> <p>Decision requested: Allow S169.035.</p>
	<p><b>Arakura Plains Development Ltd</b> <b>S173.040</b></p> <p>Opposes the requirement for non-complying activity consent for winter earthworks. Notes that large storm events can occur throughout the year. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.</p> <p>Decision requested: Allow S173.040.</p>
	<p><b>Transpower NZ Ltd</b> <b>S177.068</b></p> <p>Considers the rule should provide for associated discharges (including discharges of sediment and/or flocculant). Opposes non-complying activity status for winter earthworks and requests deletion of clause (b) and related discretionary matter (8).</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S177.068.</p>
	<p><b>David McKevitt</b> <b>S190.008</b></p>	Support in part	<p>Meridian agrees clause (b) is unreasonable and unnecessary;</p> <p>Decision requested: Allow S190.008 by deleting clause (b) and related discretionary matter (8).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Opposes the blanket restriction on winter earthworks. Requests amendment to provide for winter earthworks in specified circumstances.		
	<b>Wairarapa Federated Farmers S193.150</b>  Requests retention of operative NRP rule.	Support in part	Meridian agrees clause (b) is unreasonable and unnecessary;  Decision requested: Allow S193.150 and retain the rules for earthworks that were negotiated through mediation of the NRP or, as alternative relief, delete clause (b) and related discretionary matter (8).
	<b>Winstone Aggregates Ltd S206.088</b>  Considers the rule effectively prohibits earthworks over winter months. Considers there is insufficient evidence to support this. Opposes non-complying activity status for winter earthworks and requests deletion of clause (b) and related discretionary matter (8).	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;  Decision requested: Allow S206.088.
	<b>RP Mansell, AJ Mansell &amp; MR Mansell S217.021</b>  Considers the shut down period for winter earthworks is onerous and unnecessary. Requests deletion of winter shut down requirements.	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;  Decision requested: Allow S217.021 and delete clause (b) and related discretionary matter (8).
	<b>Cuttriss Consultants Ltd S219.031</b>	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Refers to submission point on equivalent Rule WH.P23 and opposes the requirement for non-complying activity resource consent to undertake winter earthworks.		Decision requested: Allow S219.031 and delete clause (b) and related discretionary matter (8).
	<b>EDS S222.106</b>  Requests the rule is made a discretionary activity.	Oppose	Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;  Decision requested: Disallow S222.106.
	<b>Orogen Ltd S239.019</b>  Considers non-complying activity status for winter earthworks is inappropriate and requests deletion of clause (b).	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;  Decision requested: Allow S239.019 and delete related discretionary matter (8).
	<b>Porirua City Council S240.081</b>  Considers large storm events causing larger pulses of sediment discharges can occur any time throughout the year. Requests deletion of clause (b).	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;  Decision requested: Allow S240.081 and delete related discretionary matter (8).
	<b>Carrus Corporation Ltd S247.031</b>  Refers to submission on Rule WH.R23 and opposes non-complying activity status for winter earthworks.	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;  Decision requested: Allow S247.031 by deleting clause (b) and related discretionary matter (8).

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Department of Corrections</b> <b>S248.065</b></p> <p>Considers the rule should provide for associated discharges (including discharges of sediment and/or flocculant). Opposes non-complying activity status for winter earthworks and requests deletion of clause (b) and related discretionary matter (8).</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S248.065.</p>
	<p><b>Thames Pacific</b> <b>S252.030</b></p> <p>Refers to submission point on Rule WH.R23 and opposes non-complying activity status for winter earthworks.</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S252.030 by deleting clause (b) and delete related discretionary matter (8).</p>
	<p><b>Best Farm Ltd</b> <b>S254.020</b></p> <p>Does not support the winter shutdown period. Considers it is possible and reasonable to work into June or start in September. Requests deletion of the winter shutdown requirement.</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S254.020 by deleting clause (b) and delete related discretionary matter (8).</p>
	<p><b>Woodridge Holdings Ltd</b> <b>S255.074</b></p> <p>Considers Rule P.R23 repeats Rule WH.R24 and is unnecessary. Requests combining the rules into one rule.</p>	Neutral	<p>Meridian considers the restriction on winter earthworks is unreasonable and unnecessary, regardless of how the rules are organised;</p> <p>Decision requested: Allow S255.074 only to the extent consistent with Meridian's other requested relief on Rule P.R23 (being deletion of clause (b) and related discretionary matter (8)).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Kāinga Ora</b> <b>S257.065</b></p> <p>Opposes condition (b) and the resulting escalation to a non-complying activity. Requests deletion of (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S257.065 and delete related discretionary matter (8).</p>
	<p><b>The Fuel Companies</b> <b>S258.045</b></p> <p>Considers the rule should focus on best practice erosion and sediment control. Requests amendments to this effect but retains proposed clause (b).</p>	Oppose in part	<p>Meridian considers the clause (b) restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Disallow S258.045 in part by deleting clause (b) and related discretionary matter (8).</p>
	<p><b>Forest &amp; Bird</b> <b>S261.194</b></p> <p>Requests the rule is reclassified a discretionary activity.</p>	Oppose	<p>Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;</p> <p>Decision requested: Disallow S261.194.</p>
	<p><b>KiwiRail Holdings Ltd</b> <b>S279.024</b></p> <p>Supports the intent of the provision and requests retention as notified.</p>	Oppose in part	<p>Meridian considers the clause (b) restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Disallow S279.024 in part by deleting clause (b) and related discretionary matter (8).</p>
	<p><b>Civil Contractors NZ</b> <b>S285.033</b></p> <p>Strongly opposes and considers the winter earthworks shutdown is inappropriate.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary. Meridian's preference is that clause (b) and related discretionary matter (8) are deleted;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	Requests amendment of clause (b) to ensure sufficient and appropriate exemptions exist to provide some ability for earthworks where potential sediment can be well managed and controlled.		Decision requested: Allow S285.033 by deleting clause (b) and related discretionary matter (8).
<p><b><u>Rule P.R24: Earthworks – non-complying activity</u></b> Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R23 is a non-complying activity.</p>	<p><b>Wellington City Council S33.123</b></p> <p>Considers the rule is consistent with WCC's PDP and requests retention as notified.</p>	Oppose in part	<p>Meridian considers the restriction on winter earthworks and default to non-complying activity rule is unreasonable and unnecessary;</p> <p>Decision requested: Disallow S33.123 and provide for winter works as a restricted discretionary activity.</p>
	<p><b>Fulton Hogan Ltd S43.030</b></p> <p>Considers the non-complying activity status is too restrictive given the number of activities that would be captured under Rule P.R24. Requests amendment to provide for low level earthworks activities.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate and agrees that provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S43.030 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Transpower NZ Ltd S177.069</b></p> <p>Considers non-complying activity status for minor breaches of rule conditions is inappropriate for earthworks associated with the National Grid. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S177.069 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Wairarapa Federated Farmers S193.151</b></p> <p>Requests retention of the operative NRP rule and deletion of Rule P.R24.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S193.151 or, as alternative relief, provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Winstone Aggregates S206.089</b></p> <p>Opposes non-complying activity status. Considers the rule, in conjunction with Policy P.P29, effectively prohibits winter earthworks. Requests amendment to discretionary activity status.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S206.089 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>RP Mansell, AJ Mansell &amp; MR Mansell S217.022</b></p> <p>Generally supports the effects management approach but considers discretionary activity is more appropriate than non-complying activity status. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S217.022 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Porirua City Council</b> <b>S240.082</b></p> <p>Supports in principle and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S240.082 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Department of Corrections</b> <b>S248.066</b></p> <p>Considers non-complying activity status for earthworks that do not comply with Rule P.R23 is onerous and unnecessary. Non-complying activity status for minor breaches of rule conditions is problematic for bundled consents which results in a high degree of uncertainty. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S248.066 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Woodridge Holdings Ltd</b> <b>S255.075</b></p> <p>Considers Rule P.R24 repeats Rule WH.R25 and requests combining the rules into one rule.</p>	Neutral	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S255.075 only to the extent consistent with Meridian's requested relief (provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions).</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>The Fuel Companies</b> <b>S258.046</b></p> <p>Supports Rule P.R24 provided changes sought are made to Rule P.R23. Requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S258.046 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>Forest &amp; Bird</b> <b>S261.195</b></p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S261.195 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p><b>KiwiRail Holdings Ltd</b> <b>S279.025</b></p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S279.025 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><b><u>Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity</u></b>  <u>The use of 20 hectares or more of land on a farm for pastoral land use, arable land use, or more than 5 hectares for horticultural land use, and the associated discharge of contaminants into a surface water body or into or onto land where a contaminant may enter freshwater is a permitted activity provided the following conditions are met:</u></p> <p>(a) <u>a farm environment plan in respect of the land and associated land use is supplied to Wellington Regional Council by the date set out in Table 9.5 for the part Freshwater Management Unit in which the farm is located, and</u></p> <p>(b) <u>if the farm used for pastoral land use contains highest erosion risk land (pasture) or high erosion risk land (pasture), the farm environment plan includes an erosion risk treatment plan, that meets the requirements of Schedule 36 (farm environment plan - additional), and</u></p> <p>(c) <u>a farm environment plan certifier certifies in writing that:</u>  <u>(i) the farm environment plan supplied to the Wellington Regional Council has been prepared in accordance with, and meets the</u></p>	<p><b>Diane Strugnell</b>  <b>S5.012</b></p> <p>Considers it is important that farming in the Waitua has continued support. Requests retention as notified.</p>	<p>Oppose in part</p>	<p>Meridian opposes the requirement for re-vegetation of at least 50% of identified high erosion risk and highest erosion risk land in Schedule 36 Parts B and E that is imposed through Rule P.R26 (b);</p> <p>Decision requested: Allow S5.012 only to the extent consistent with Meridian’s requested relief on Schedule 36 (Parts B and E not applying to lawfully established renewable electricity generation activities).</p>
	<p><b>Donald Love</b>  <b>S102.003</b></p> <p>Requests amendment to Schedule 36 B to remove the woody vegetation re-vegetation requirement.</p>	<p>Support in part</p>	<p>Meridian considers the Schedule B requirement for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and opposes the imposition of the requirement through Rule P.R26;</p> <p>Decision requested: Allow S102.003 or, as alternative relief, exempt existing renewable electricity generation activities from the re-vegetation requirements in Schedule 36 B.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><u>requirements of Schedule Z (farm environment plan) and Schedule 36 (farm environment plan - additional), or</u>  <u>(ii) where the farm environment plan is certified under section 217G of Part 9A of the RMA, that the farm environment plan meets the requirements of condition (b), and</u>            (d) <u>the land use is undertaken in accordance with the farm environment plan provided under condition (a).</u></p>		
<p><b><u>Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua</u></b>            ....  <b><u>B Management objectives</u></b>  <u>In addition to the management objectives described in Part B of Schedule Z, the farm environment plan must demonstrate that the measures adopted to address the identified risks will result in the revegetation of highest erosion risk land (pasture), and treatment to address erosion risks on other land including high erosion risk land (pasture), with at least 50% of highest erosion risk land (pasture), being revegetated by 30 December 2033, and the remaining highest risk erosion land (pasture) being</u></p>	<p><b>Diane Strugnell</b>  <b>S5.016</b></p> <p>Considers various risk factors are not taken into account by the single solution. Requests deletion of the requirement for re-vegetation.</p>	Support in part	<p>Meridian considers the Schedule 36B and 36E requirements for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and seeks an exemption from the requirement, either in Schedule 36B and 36E or in the relevant rules;</p> <p>Decision requested: Allow S5.016 by providing an exemption from the re-vegetation requirements in Schedule 36B and 36E for farm land within or associated with lawfully established renewable electricity generation activities.</p>
	<p><b>Donald Love</b>  <b>S102.007</b></p> <p>Considers it is not clear that replacing lightly stocked grassland with woody vegetation would achieve net sediment reduction. Requests</p>	Support in part	<p>Meridian considers the Schedule 36 B and 36E requirements for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and seeks an exemption from the requirement, either in Schedule 36B and 36E or in the relevant rules;</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>revegetated by 30 December 2040, unless this is not reasonably practicable, and a certifier certifies that alternative erosion control treatment over the balance of the property will result in the same level of soil loss avoidance.</u></p> <p>...</p> <p><b><u>E Erosion Risk Treatment Plan</u></b>  <u>A farm environment plan for a property that contains highest erosion risk land (pasture) or high erosion risk land (pasture) must include an erosion risk treatment plan that contains the following:</u></p> <p><u>1. A programme to ensure that 50% of the total area of any highest erosion risk land (pasture) on the property is in permanent woody vegetation within 10</u></p>	<p>removal of the 50% wood vegetation re-vegetation requirement.</p>		<p>Decision requested: Allow S102.007 by deleting the requirement or, as alternative relief, provide an exemption from the re-vegetation requirements in Schedule 36 B and 36E for farm land within or associated with lawfully established renewable electricity generation activities.</p>
	<p><b>Wairarapa Federated Farmers S193.184</b></p> <p>Requests deletion of Schedule 36.</p>	<p>Support in part</p>	<p>Meridian considers the Schedule 36B and 36E requirements for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and seeks an exemption from the requirement, either in Schedule 36B and 36E or in the relevant rules;</p> <p>Decision requested: Allow S193.184 by deleting the requirement for 50% re-vegetation with woody vegetation or, as alternative relief, provide an exemption from the re-vegetation requirements in Schedule 36B and 36E for farm land within or associated with lawfully established renewable electricity generation activities.</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
<p><u>years of the farm environment plan being certified, where permanent woody vegetation:</u></p> <p>(a) <u>(a) can reasonably be expected to reach canopy cover of at least 80% per hectare within 10 years of being established, and</u></p> <p>(b) <u>(b) is not plantation forestry, and</u></p> <p>(c) <u>(c) subject to meeting (a) and (b) above, may include appropriate planted species or species that may naturally regenerate.</u></p> <p>...</p>	<p><b>Willowbank Trustee Ltd</b> <b>S204.010 and S204.011</b></p> <p>Opposes the requirement for revegetation of at least 50% of land by December 2033 due to practicalities. Considers it is not always possible to establish woody vegetation on pasture due to farm circumstances and that the focus should be on addressing erosion risk in an achievable and appropriate manner, which may lead to site-specific solutions rather than a 'one-size-fits-all' approach. Requests amendment to state 'where practicable' in various provisions including in Schedule 36E.</p>	<p>Support in part</p>	<p>Meridian considers the requirement for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and that this is another of the practicalities that Schedule 36 should address. Meridian seeks an exemption from the requirement, either in Schedule 36B and 36E or in the relevant rules;</p> <p>Decision requested: Allow S204.010 and S204.011 by deleting the requirement for 50% re-vegetation with woody vegetation or, as alternative relief, provide an exemption from the re-vegetation requirements in Schedule 36B and 36E for farm land within or associated with lawfully established renewable electricity generation activities.</p>
<p><b><u>Maps of highest erosion risk and high erosion risk Te Whanganui-a-Tara:</u></b></p>			
<p><b><u>Map 93 Highest and high erosion risk land (pasture)</u></b></p>	<p><b>PF Olsen Ltd</b> <b>S18.075</b></p> <p>Considers there is more research available to determine landslide susceptibility. Requests deletion of the mapping layer or peer review to establish its scientific validity.</p>	<p>Support in part</p>	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S18.075</p>
	<p><b>Wairarapa Federated Farmers</b> <b>S193.198</b></p> <p>Considers the mapping methodology is not fit for purpose. Requests deletion of the map.</p>	<p>Support in part</p>	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S193.198</p>

	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Pareraho Forest Trust</b> <b>S213.031</b></p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Disallow S213.031 and delete the map.</p>
	<p><b>Kāinga Ora</b> <b>S257.075</b></p> <p>Supports the identification of land but considers the maps are not readily able to be understood at a site-based level. Considers a definition (rather than mapping) is more appropriate to capture these areas of land. Requests deletion of the map and replacement with a definition to more accurately identify sites.</p>	Support in part	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S257.075</p>
	<p><b>Forest &amp; Bird</b> <b>S261.270</b></p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Disallow S261.270 and delete the map.</p>
<b><u>Map 94 Highest erosion risk land (woody vegetation clearance)</u></b>			
	<p><b>PF Olsen Ltd</b> <b>S18.076</b></p> <p>Considers there is more research available to determine landslide susceptibility. Requests deletion of the mapping layer or peer review to establish its scientific validity.</p>	Support in part	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S18.076</p>



	<b>Submission Points:</b>	<b>Support or Oppose:</b>	<b>Reasons and Decisions Requested:</b>
	<p><b>Wairarapa Federated Farmers</b> <b>S193.199</b></p> <p>Considers the mapping methodology is not fit for purpose. Requests deletion of the map.</p>	Support in part	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S193.199</p>
	<p><b>Kainga Ora</b> <b>S257.076</b></p> <p>Supports the identification of land but considers the maps are not readily able to be understood at a site-based level. Considers a definition (rather than mapping) is more appropriate to capture these areas of land. Requests deletion of the map and replacement with a definition to more accurately identify sites.</p>	Support in part	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S257.076</p>
	<p><b>Forest &amp; Bird</b> <b>S261.271</b></p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Disallow S261.271 and delete the map.</p>



## **Further Submission on Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region under Clause 8 of Schedule 1 Resource Management Act 1991**

8 March 2024

[regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

### **Submitter Details**

**Name of Submitter: Andrew Crisp, Chief Executive, Ministry of Housing and Urban Development (HUD)**

This is a further submission on Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region.

### **HUD's roles and responsibilities**

HUD leads the New Zealand Government's housing and urban development work programme. We are responsible for strategy, policy, funding, monitoring and regulation of New Zealand's housing and urban development system. We are working to:

- address homelessness
- increase public and private housing supply
- modernise rental laws and rental standards
- increase access to affordable housing, for people to rent and buy
- support quality urban development and thriving communities.

We work closely with other central and local government agencies, the housing sector, communities, and iwi to deliver on our purpose – thriving communities where everyone has a place to call home.

HUD has a particular interest in this Plan Change stemming from its co-lead role in developing the National Policy Statement on Urban Development (NPS-UD) and overseeing its implementation.

The NPS-UD aims to ensure councils better plan for growth and the planning decisions support competitive land and development markets, including that decisions are responsive to unplanned development opportunities that were not foreseen by the relevant council when the RMA plans are prepared or reviewed. Overly restrictive barriers to development should be removed to allow growth in locations that have good access to services, public transport networks and infrastructure. The NPS-UD intensification policies require councils to enable greater heights and densities in areas that are well-suited to growth, such as in and around urban centres and rapid transit stops.



HUD is seeking to enable an adaptive and responsive housing system where land-use change, infrastructure and housing supply is responsive to demand, well planned and well regulated.

Given HUD's roles and responsibilities, HUD:

- is representing a relevant aspect of the public interest; and
- has an interest in the proposal that is greater than the interest the general public has.

### Scope of Submission

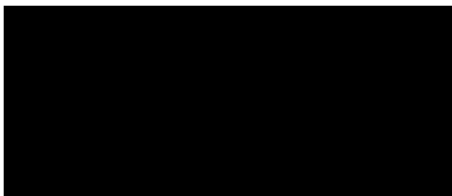
HUD supports and recognises the need to protect water quality. However, HUD considers that the plan change does not give adequate consideration to balance required between the water quality objectives and the objectives of the NPS-UD. There needs to be a reasonable balancing of the interests and benefits of urban development and this plan change does not provide for that. In particular, the stormwater provisions that have the effect of preventing urban developments without any ability to consider the effects or benefits of the developments place an unnecessary regulatory burden on future urban development and are too restrictive in the management of water quality issues.

The prohibited activity status of new stormwater connections or discharges for all unplanned greenfield developments is inconsistent with the NPS-UD and unnecessary to manage water quality issues. The implementation of the NPS for Freshwater Management (NPS-FM) should not adversely affect the ability to undertake urban development any more than is necessary. Any rule framework around urban development (planned or unanticipated) should be able to consider what mitigation measures are proposed in the development to manage potential stormwater issues such as retention ponds and hydraulic neutrality.

The details of HUD's further submission points are set out in the attached table.

### Hearings

HUD wishes to be heard in support of its submission. If others make a similar submission, HUD will consider presenting a joint case with them at a hearing.



Andrew Crisp, Chief Executive, Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

Address for Service of person making submission:

Ministry of Housing and Urban Development

Email: [RMAPlans@hud.govt.nz](mailto:RMAPlans@hud.govt.nz)

Contact Person: Mike Hurley (Phone 04 832 2413)

Postal Address: Ministry of Housing and Urban Development, PO Box 82, Wellington 6140

## Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b> <i>Unique identifying number allocated to each specific <u>submission point</u>, located in the second column of the summary of decisions requested table:</i>	<b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i>	<b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i>	<b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.  Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
257 Kāinga Ora	257.006	Support	Allow	Remove "reconstruction" and "replacement" from definition [of Redevelopment].  Alternatively, create an appropriate exclusion for larger areas where no treatment is provided.	Agree that areas of existing impervious surfaces on site that are going to be reconstructed or built on within a site should be excluded. The provisions should only apply to new or additions to impervious surfaces.
257 Kāinga Ora	257.009	Support	Allow	A full review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89.  Exclusion of land zoned as open space areas from unplanned greenfield areas where these are located in an urban environment.  Include new definition for Greenfield Development. Within this definition, seek also an exclusion of infrastructure works (as infrastructure works often traverses non-urban zones to service the urban environment). Further infrastructure works (including network upgrades) can result in	The NPS-UD requires that local authority decisions on plan changes are responsive to unanticipated development proposals that would add to significantly to development capacity and contribute to well-functioning urban developments and this applies to both greenfield and brownfield proposals. The prohibited activity status for unplanned greenfield developments to be able to connect to a stormwater network or provide new stormwater infrastructure does not support competitive land and development markets and is likely to

				<p>the enhancement and betterment of environmental and water quality outcomes).</p> <p>Delete associated Prohibited Activity rule framework / or reduce activity status to align with the NPS-UD.</p>	<p>have adverse effects on housing affordability. The relief sought seeks better alignment with the NPS-UD.</p>
225 Upper Hutt City Council	S225.048	Support	Allow	<p>Opposes extent of Map 88 as does not accurately reflect Council plan change 50 notified on 4 October 2023 and is inconsistent around proposed settlement zone land.</p> <p>Considers provision should apply from date of PC1 decision and not date of notification. Considers it gives landowners and developers ability to complete planning processes (such as in train resource consents or plan changes). Current date as notified, would circumvent ongoing planning process and prevent rezoning submissions on active plan changes.</p>	<p>Agree with the submitter that it is inappropriate for this plan change to circumvent ongoing planning processes.</p> <p>The implementation of the NPS-FM should not adversely affect the ability to undertake urban development any more than necessary.</p>
S240 Porirua City Council	S240.014	Support	Allow	<p>Amend definition as follows: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change <del>(from rural/nonurban/ open space to urban)</del> though a District Plan change to enable the development. <del>Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.</del></p>	<p>Agree with the submitter that it is not appropriate to provide no consenting pathway, as that excludes any possibility to consider the effects from development and the benefits that it could provide; including environmental enhancement.</p>

S286 Taranaki Whānui	S286.009	Support	Allow	Concerned policy and provisions will impose significant costs and impact the ability of Taranaki Whānui whanau to develop their ancestral lands. Notes land not yet returned to Māori ownership through treaty settlements, includes many sites in areas mapped as “unplanned greenfield land” including rural and open space land. Considers prohibition on developing these lands inconsistent with principles of Te Tiriti.	Agree that Taranaki Whānui should have the ability to develop their ancestral land.
257 Kāinga Ora	257.010 Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a Tara is progressively improved and is wai ora by 2100.	Support	Allow	Consequential changes sought where relevant to reconcile outcomes to changes sought in specific rules.  Amendments to align with and not go beyond what is required under the NPS-FM.  Amend to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes.	Agree that the implementation of the NPS-FM should not adversely affect the ability to undertake urban development any more than necessary.
S211 Hutt City Council	211.010 Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support in part	Allow in part	Concerned with the proposed prohibited activity status for unplanned greenfield development; considers that this precludes consenting pathways for development in unplanned greenfield areas which may have positive outcomes. Concerned that minor activities which extend into unplanned greenfield areas would be prohibited.  Seeks amendments to the policy as follows:  Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and	Share the concerns of the Council but consider that “prohibiting” should be replaced with “managing” (rather than “avoiding”) as requested by Upper Hutt City Council.  The prohibited activity status is inconsistent with the NPS-UD.

				<p>coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</p> <p>(a) <del>prohibiting</del> <u>avoiding</u> unplanned greenfield development and for managing other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and <del>(b) — encouraging — redevelopment activities within existing urban areas to reduce the existing urban contaminant load,</del> and (c) imposing hydrological controls on urban development and stormwater discharges to rivers</p> <p>...</p>	
S161 Gillies Group Management Ltd	S161.011 Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Allow in part	<p>Opposes provisions for unplanned greenfield growth as the prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Notes that the s32 report states that all contaminants can be mitigated through treatment and financial contributions, and considers that prohibited activity status is inappropriate in this case. Further considers the prohibited activity status inconsistent with Policy 8 of the NPS-UD. Notes that the s32 report sets out the prohibited activity status to require both a regional and district plan change to enable greenfield development. Considers the need for two plan changes will be expensive</p>	<p>Agree with the submitter’s concerns that the requirement for two plan changes will be expensive and will make it difficult for market responsiveness to the provision of housing. The prohibited activity status for unplanned greenfield development is inconsistent with the NPS-UD.</p>

				<p>and will make it difficult for market responsiveness to the provision of housing.</p> <p>Seeks the following changes:</p> <p>(a) <del>prohibiting unplanned greenfield development and for other greenfield developments</del> <u>minimising the contaminants</u> from greenfield developments <del>and requiring financial contributions as to offset adverse effects from residual stormwater contaminants,</del> and</p>	
S225 Upper Hutt City Council	S225.067 Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Allow	<p>Opposes prohibition of development, as it limits options to give effect to NPS-UD and overrides District Plan changes and reviews currently underway or proposed in future.</p> <p>Considers greenfield development has more opportunity to address effects, particularly given space available to incorporate design and infrastructure solutions when compared to constrained urban environments.</p> <p>Notes prohibition in policy, and direction in objective above it, would render a future plan change an impossibility as it wouldn't implement higher order documents. Considers the section 32 analysis would need to consider provisions PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans.</p> <p>seek that the policy is amended to read:</p> <p>... "</p> <p>(a) <del>prohibiting</del> <u>managing</u> unplanned</p>	<p>The implementation of the NPS-FM should not adversely affect the ability to undertake urban development requirements any more than necessary.</p> <p>There should be more appropriate balance between the requirements of the NPS-FM and the NPS-UD requirements that allows the potential effects and benefits of unplanned greenfield developments, including environmental enhancement, to be considered.</p>



				greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and"	
257 Kāinga Ora	257.011 Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Allow	Remove reference to prohibiting unplanned greenfield development at WH.P2(a).	Oppose the reference to prohibiting unplanned greenfield development at WH.P2(a).  The blanket prohibition against unplanned greenfield development is unnecessary and does not align with the NPS-UD.
S286 Taranaki Whānui	S286.032 Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Allow	Amend policy:  Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives. Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:  (a) <del>prohibiting unplanned greenfield development and for managing other greenfield developments</del> by minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and ...	Agree with the submitter that the prohibited status should be removed to improve the ability of Taranaki Whānui to develop their ancestral land.

S225 Upper Hutt City Council	S225.077 Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Allow	Amend the definition of redevelopment and review the practicality of thresholds where this policy applies.	Agrees with the reasons provided by the Upper Hutt City Council and shares the submitter's concerns included in the summary of submissions as follows:  "Supports intent of improving water quality by managing stormwater contaminants, but considers thresholds for application must be reviewed and clarified. Concerned with application of definition for 'redevelopment' in policy, particularly in case of resurfacing, or 'like for like' replacement of surfaces where there is no change to end state water run-off. Considers it inappropriate and unjust to require onsite stormwater systems to be installed, due to the 'like for like' replacement of impervious surfaces. Considers this places unnecessary burden on land owners seeking to undertake maintenance of their properties."
S257 Kāinga Ora	S257.019 Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Allow	Review policy drafting to ensure it is more "policy focused".  Consequential amendments are sought to reflect changes sought in associated rules	
S161 Gillies Group Management Ltd	S161.014 Policy WH.P16: Stormwater discharges from new unplanned greenfield development	Support	Allow	Delete Policy  Opposes the avoidance/prohibited approach to greenfield development. Considers that prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. Considers the prohibited activity status is inconsistent with the NPS-UD.	Like the submitter, oppose this policy and the Prohibited Rule framework. Consider that the policy is too narrow since it does not provide any pathway or guidance other than avoidance and the proposed prohibited activity framework is overly onerous.  The proposed approach of effectively prohibiting any unplanned greenfield development is inconsistent with the

S257 Kāinga Ora	S257.021 Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Support	Allow	Delete the policy Alternatively, amend the proposed policy to provide a pathway where the effects from additional stormwater discharges can be managed appropriately. This alternative framework could also incorporate a set of criteria for out of sequence development, which is in line with the direction of the NPS-UD.	NPS-UD and not necessary to manage water quality issues or implement the NPS-FM.
S286 Taranaki Whānui	S286.047 Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Support	Allow	Delete Policy	
S211 Hutt City Council	S211.017 Policy WH.P31: Winter shut down of earthworks.	Support	Allow	Delete Policy	Concerned policy reads more like a rule or standard rather than outlining how an objective will be implemented.  Consider that a blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope, soil type, scale and duration of the work) is more appropriate.  High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.
S225 Upper Hutt City Council	S225. 093 Policy WH.P31: Winter shut down of earthworks.	Support	Allow	Delete policy or amend to be a policy rather than a rule or standard.	
S257 Kāinga Ora	S257.026 Policy WH.P31: Winter shut down of earthworks.	Support	Allow	Delete the policy and consequential changes to WH.P29 and the related rule framework.	

S225 Upper Hutt City Council	S225.098 Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow	Amend to remove the 1000m <sup>2</sup> threshold in relation to upgrading, maintaining and renewing of existing roads, footpaths/cyclepath and driveways.	<p>The rule will impose a considerable regulatory burden and cost on development and maintenance activities through the consent requirements.</p> <p>The rule framework should seek to minimise any potential maintenance costs on existing infrastructure.</p>
S257 Kāinga Ora	S257.028 Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow	<p>Increase permitted impervious surface threshold above 1000m<sup>2</sup> to at least no less than 5000m<sup>2</sup>.</p> <p>Clarify that the threshold relates to new/additional areas of impervious surfaces</p> <p>Clarify that external fixings are excluded at WH.R5(b)</p> <p>Delete WH.R5(c).</p> <p>Include permitted pathway for developments where they are operating under a certified sub-catchment Stormwater Management Plan [or similar].</p>	<p>Consider that 1,000m<sup>2</sup> of impervious area is too a low baseline for development and that the requirements should be limited to new or additional impervious surfaces.</p> <p>The requirement in WH.5(c) for any new impervious surface that exceeds 30m<sup>2</sup> to require hydrological control is excessive. It should be deleted given the overlap and conflict with Wellington Water's requirements for stormwater neutrality.</p> <p>The framework should also recognise and provide for the fact that large scale developments may provide off-site controls to manage stormwater runoff.</p>
S286 Taranaki Whānui	S286.069	Support	Allow	Develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions. Exclude papakāinga development from rule.	<p>Agree with the submitter that catchment-scale communal schemes may be more efficient than numerous small systems on individual sites.</p> <p>Agree with the submitter's reasons that note:</p> <p>"PC1 does not contain sufficient direction on how measures will be implemented and does not set out what</p>

					<p>would be considered an acceptable solution to comply.</p> <p>Considers if technical specifications were included, it would mean that smaller developments could rely on these without having to develop expensive bespoke solutions on site by-site basis.</p> <p>Considers rule would impose significant costs on the development of papakāinga. Concerned this will make it hard to develop land for the long-term benefit of Taranaki Whānui whanau.”</p>
S33 Wellington City Council	<p>S38.015</p> <p>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.</p>	Support	Allow	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	Agree with Wellington City Council that the regional plan should not duplicate provisions in the district plan or existing resource consent requirements. The rule should not apply when the site is connected to a local authority stormwater network.
S161 Gillies Group Management Ltd	<p>S161.020</p> <p>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.</p>	Support	Allow	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.	If technical specifications were included, it would mean that smaller developments could rely on these without having to develop expensive bespoke solutions on site by-site basis.

S257 Kāinga Ora	S257.030 Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity	Support	Allow	Increase the 1000m <sup>2</sup> -3000m <sup>2</sup> threshold commensurate with the minimum 5000m <sup>2</sup> threshold for permitted activities.	Agree that the threshold is too low for permitted activities and imposes an unnecessary regulatory burden especially where it is duplicating district plan provisions.
S33 Wellington City Council	S33.065 Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support	Allow	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	Agree with Wellington City Council that the regional plan should not duplicate provisions in the district plan or existing resource consent requirements. The rule should not apply when the site is connected to a local authority stormwater network.
S257 Kāinga Ora	S257.031 Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Support	Allow	Reframe as a RD activity status Increase the 3000m <sup>2</sup> threshold commensurate with the relief sought in WH.R5.  Include an exclusion to WH.R11(b) where a proposal is being undertaken as part of a wider comprehensive development that includes a catchment scale stormwater treatment system.	Agree with the submitter that the matters of discretion can be identified for the restricted discretionary activity status to be applied.
S33 Wellington City Council	S33.067 Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Support in Part	Allow in Part	Amend rule to Discretionary activity status OR delete rule.	The proposed approach of effectively prohibiting any unplanned greenfield development is inconsistent with the NPS-UD.  A prohibited activity status does not provide a consenting pathway to

S161 Gillies Group Management Ltd	S161.023 Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Support	Allow	Delete the rule	<p>consider a proposal that may have positive outcomes for the community or for freshwater. As submitters have identified, the activity status fails to recognise that greenfield development can provide a range of opportunities to more effectively undertake catchment based stormwater management and enhance the environment, particularly those that are already in a degraded state.</p> <p>Support the note raised in Wellington City Council’s submission “that as per case law prohibited activity class should not be used to defer an evaluation of a particular activity until such time as a plan change is lodged to allow undertaking the activity in question.”</p> <p>The RMA requires that a district plan “must not be inconsistent with a regional plan. HUD shares the concerns raised by Upper Hutt City Council that the prohibited activity could even hinder plan changes to the District Plan given that the policy and objective above it includes prohibition.</p>
S225 Upper Hutt City Council	S225.104 Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Support	Allow	Delete rule or amend significantly to change from prohibited and provide a consenting pathway for unplanned greenfield developments. Seek this specifically should not apply to developments feeding into existing stormwater networks that will have an existing stormwater network discharge consent.	
S257 Kāinga Ora	S257.033 Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Support	Allow	Delete rule.  Alternatively, amend activity status and remove consequential requirement for separate Plan Change process, instead incorporating a set of criteria for out of sequence development that is in line with the NPS UD.  Undertake review of, and expansion to the areas identified as planned/existing urban areas on maps 86 89.	
S286 Taranaki Whānu	S286.077 Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Support	Allow	Delete Rule	

S257 Kāinga Ora	S257.036 Rule WH.R23: Earthworks – permitted activity.	Support in Part	Allow in Part	Delete WH.R23(c)(iv) Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance.	Support an exemption for the trenching so that infrastructure provision and maintenance is permitted.  Agree with the submitter that (c)(iv) is too restrictive (an absolute avoidance of any runoff will be extremely difficult to comply with) and should be deleted but also consider that the permitted activity status can still have a requirement for sedimentation controls and that this could include something similar to the total suspended solids limits in WH.R24(a)
S257 Kāinga Ora	S257.037 & S257.038 Rule WH.R24: Earthworks - restricted discretionary activity. & Rule WH.R25: Earthworks - non-complying activity	Support	Allow	Delete WH.R25 with consideration of winter works being a listed matter of discretion under WH.R24.  Delete the condition in the rule at WH.R24(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule.  Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing	Oppose the blanket exclusion around winter earthworks and consider that potential effects can be adequately managed as a restricted discretionary activity.  A blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope, soil type, scale and duration of the work) is more appropriate.  High rainfall events can occur at any time of year and a blanket ban of winter earthworks does not recognise or manage this.



S257 Kāinga Ora	S257.041 Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives	Support	Allow	Remove reference to prohibiting unplanned greenfield development at P.P2(a).	The proposed approach of effectively prohibiting any unplanned greenfield development is inconsistent with the NPS-UD.
S33 Wellington City Council	S33.098 Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Support	Allow	Amend policy to allow for Discretionary activity status OR delete policy.	The proposed approach of effectively prohibiting any unplanned greenfield development is inconsistent with the NPS-UD.
S161 Gillies Group Management Ltd	S161.029 Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Support	Allow	Delete policy	A prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. As submitters have identified, the activity status fails to recognise that greenfield development can provide a range of opportunities to more effectively undertake catchment based stormwater management and enhance the environment, particularly those that are already in a degraded state.
S240 Porirua City Council	S240.046 Policy P.P15: Stormwater discharges from new unplanned greenfield development	Support	Allow	Delete Policy	Concerned the policy will hinder the rezoning of land in a district plan,

S257 Kāinga Ora	S2457.049 Policy P.P15: Stormwater discharges from new unplanned greenfield development	Support	Allow	Delete the policy Alternatively, amend the proposed policy to provide a pathway where the effects from additional stormwater discharges can be managed appropriately. This alternative framework could also incorporate a set of criteria for out of sequence development, which is in line with the direction of the NPS-UD. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.	including sites that could be converted to housing, community facilities, education facilities and not expand the current urban boundary.  Noting the RMA is an effects-based framework, considers it unclear why new stormwater discharge from unplanned greenfield development is treated differently from stormwater discharge from planned development.  Support the note raised in Wellington City Council's submission "that as per case law prohibited activity class should not be used to defer an evaluation of a particular activity until such time as a plan change is lodged to allow undertaking the activity in question.
S161 Gillies Group Management Ltd	S161.030 Policy P.P29: Winter shut down of earthworks.	Support	Allow	Delete policy	Consider that a blanket exclusion to winter earthworks is too blunt an approach that will impose significant costs to developments. An effects management approach that can consider the likely risk of the site (such as topography, slope soil type, scale and duration of the work) is more appropriate.
S240 Porirua City Council	S240.060 Policy P.P29: Winter shut down of earthworks.	Support	Allow	Delete Policy	
S257 Kāinga Ora	S2457.054 Policy P.P29: Winter shut down of earthworks.	Support	Allow	Delete the policy and consequential changes to WH.P29 and the related rule framework.	

S33 Wellington City Council	S33.110 Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	Agree with Wellington City Council that the regional plan should not duplicate provisions in the district plan or existing resource consent requirements. The rule should not apply when the site is connected to a local authority stormwater network.
S257 Kāinga Ora	S257.056 Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Support	Allow	Increase permitted impervious surface threshold above 1000m <sup>2</sup> to at least 5000m <sup>2</sup> . Clarify that the threshold relates to new/additional areas of impervious surfaces  Clarify that external fixings are excluded at P.R5(b).  Delete P.R5(c).  Include permitted pathway for developments where they are operating under a certified sub-catchment Stormwater Management Plan [or similar].	Agree with the submitter that the threshold is too low for permitted activities and imposes an unnecessary regulatory burden especially where it is duplicating district plan provisions.
S240 Porirua City Council	S240.066 Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Support in part	Allow in part	Develop an acceptable solution for compliance either through incorporating guidance by reference, within the rule itself, or as an appendix to the plan.	Agree with the submitter that “the rule does not outline what types of hydrological controls should be implemented and it is unclear what would be considered an acceptable solution to comply with the provisions, and the definition of 'hydrological control' doesn't provide any guidance in this regard.” However, consider that this guidance can be via a technical document that sits outside of the plan similar to the erosion and sediment control guidance.

S257 Kāinga Ora	S257.057 Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Support	Allow	Increase the 1000m <sup>2</sup> -3000m <sup>2</sup> threshold commensurate with the relief sought in P.R5 above seeking a permitted threshold of at least 5000m <sup>2</sup> . Failing implementation of changes sought under P.R5 above, provide for proposal to be Controlled activity where it fails to meet P.R6(a), but is being undertaken in accordance with a certified sub-catchment Stormwater Management Plan [or similar]. Include an exclusion to P.R6(c) where a proposal is being undertaken as part of a wider comprehensive development that includes a catchment scale stormwater treatment system.	Agree that the threshold is too low for permitted activities and imposes an unnecessary regulatory burden especially where it is duplicating district plan provisions and that the rule framework should better enable recognise that there can be benefits of catchment scale stormwater treatment system.
S33 Wellington City Council	S33.112 Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Support	Allow	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks	Agree with Wellington City Council that the regional plan should not duplicate provisions in the district plan or existing resource consent requirements.
S240 Porirua City Council	S240.067 Rule P.R7: Stormwater from new and redeveloped impervious	Support in part	Allow in part	Develop an acceptable solution for compliance either through incorporating guidance by reference, within the rule itself, or as an appendix to the plan.	Agree with the submitter that this rule will have a significant economic impact on urban development and create a regulatory burden on GWRC and the note that:  “the rule does not outline what types of hydrological controls should be implemented and it is unclear what would be considered an acceptable solution to comply with the provisions, and the definition of 'hydrological

					control' doesn't provide any guidance in this regard." However, consider that this guidance can be via a technical document that sits outside of the plan similar to the erosion and sediment control guidance.
S257 Kāinga Ora	S257.058 Rule P.R7: Stormwater from new and redeveloped impervious	Support	Allow	Increase the 1000m <sup>2</sup> -3000m <sup>2</sup> threshold commensurate to the relief sought in P.R5 seeking a permitted threshold of at least 5000m <sup>2</sup> .  Failing implementation of changes sought under P.R5 above, provide for proposal to be Con activity where it fails to meet P.R6(a), but is being undertaken in accordance with a certified sub-catchment Stormwater Management Plan [or similar].	Agree that the threshold is too low for permitted activities and imposes an unnecessary regulatory burden especially where it is duplicating district plan provisions.  Support better recognition of proposals that are being in accordance with a certified sub-catchment Stormwater Management Plan (or similar) in the rule framework.
S33 Wellington City Council	S33.115 Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Allow	Support	Delete rule in its entirety OR amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	Agree with Wellington City Council that the regional plan should not duplicate provisions in the district plan or existing resource consent requirements.
S257 Kāinga Ora	S257.059 Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Support	Allow	Reframe as a RD activity status Increase the 3000m <sup>2</sup> threshold commensurate with the baseline of at least 5000m <sup>2</sup> for a permitted activity.  Include an exclusion to P.R10(b) where a proposal is being undertaken as part of a wider comprehensive development that includes a catchment scale stormwater treatment system.	Agree that the threshold is too low for permitted activities and imposes an unnecessary regulatory burden especially where it is duplicating district plan provisions and that the rule framework should better enable and recognise that there can be benefits of catchment scale stormwater treatment system.

S257 Kāinga Ora	S257. 061 Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Support	Allow	Delete rule. Alternatively, amend activity status and remove consequential requirement for separate Plan Change process, instead incorporating a set of criteria for out of sequence development that is in line with the NPS UD.  Seek review of and corresponding expansion to identified "Unplanned Greenfield Development" areas.	The proposed approach of effectively prohibiting any unplanned greenfield development is inconsistent with the NPS-UD.  A prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. As submitters have identified, the activity status fails to recognise that greenfield development can provide a range of opportunities to more effectively undertake catchment based stormwater management and enhance the environment, particularly those that are already in a degraded state.
S257 Kāinga Ora	S257.065 & S257.066 Rule P.R23: Earthworks - restricted discretionary activity & Rule P.R24: Earthworks - non-complying activity. complying activity	Support	Allow	Delete P.R24 with consideration of winter works being a listed matter of discretion under P.R23.  Delete the condition in the rule at P.R23(b) where it places a restriction on earthworks between 1st of June and 30th September and the resulting escalation to a non-complying activity. Instead, include winter works as a matter of discretion within the relevant RDA rule.  Include an exclusion within the rule that exempts activities associated with the trenching of services - i.e. thrusting, boring, trenching or mole ploughing	Oppose the blanket exclusion around winter earthworks and consider that potential effects can be adequately managed under as a restricted discretionary activity.  Winter is not the only time that heavy rainfall events occur and the provisions around the risks of earthworks should take the characteristics of the site and any mitigation proposed to manage the risks into account.
S33 Wellington	S33.148	Support	Allow	Amend boundaries to include all open space zones within the urban boundary.	If the maps are retained, they should be amended to include all open space zones

City Council	<p>Map 86: Unplanned greenfield areas - Porirua City,</p> <p>Map 87: Unplanned greenfield areas - Wellington City Council.</p> <p>Map 88: Unplanned greenfield areas - Upper Hutt City Council.</p> <p>Map 89: Unplanned greenfield areas - Hutt City Council.</p>				<p>within urban areas as areas available for planned future urban development.</p> <p>Good urban development outcomes can be achieved through development on underutilised open space land and land swaps of reserve land. This should not be prevented through the regional plan.</p> <p>The related rule framework should not exclude infrastructure or community facilities being developed on open space land.</p>
S161 Gillies Group Management Ltd	<p>S161.042, S161.043, S161.044, s161.045</p> <p>Map 86: Unplanned greenfield areas - Porirua City,</p> <p>Map 87: Unplanned greenfield areas - Wellington City Council.</p> <p>Map 88: Unplanned greenfield areas - Upper Hutt City Council.</p> <p>Map 89: Unplanned greenfield areas - Hutt City Council.</p>	Support	Allow	Delete the four maps	<p>The proposed approach of effectively prohibiting any unplanned greenfield development is inconsistent with the NPS-UD.</p> <p>A prohibited activity status or strict avoidance framework does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. As submitters have identified, the activity status fails to recognise that greenfield development can provide a range of opportunities to more effectively undertake catchment based stormwater management and enhance the environment, particularly those that are already in a degraded state.</p>

S257 Kāinga Ora	<p>S257.068, S257.069, S257.070,&amp; S257.071</p> <p>Map 86: Unplanned greenfield areas - Porirua City,</p> <p>Map 87: Unplanned greenfield areas - Wellington City Council.</p> <p>Map 88: Unplanned greenfield areas - Upper Hutt City Council.</p> <p>Map 89: Unplanned greenfield areas - Hutt City Council.</p>	Support	Allow	<p>Undertake a review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89.</p> <p>Exclude land zoned as open space areas from unplanned greenfield areas, particularly where these are located in an urban environment.</p>	<p>Agree with the submitter that:</p> <ul style="list-style-type: none"> <li>• it is not appropriate the restrict the ability to develop open space land where there are benefits in land swaps and development occurring on land that is currently open space.</li> <li>• the existing rule framework will constrain expansion and/or construction of new infrastructure in locations that benefit from a designation for such public works.</li> </ul>
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12 March 2024

Dear Greater Wellington Regional Council,

I am writing in support of the submission made by Civil Contractors New Zealand on your proposed Natural Resources Proposed Plan Change 1.

I request that you consider the feedback made in the submission, and the impact proposed changes may have on the local civil construction industry, and the region's ability to carry out infrastructure projects. Specifically, and with priority I request that you:

- Do not proceed with your proposal to implement different definitions of earthworks in different part of the region. This will only result in added cost and confusion. Please retain the existing definition of earthworks.
- Delete policy WH. P30: Discharge standard for earthworks. The proposed test methodology is not fit for purpose, and this should instead be handled in consent conditions depending on the nature of the site where the earthworks are taking place.

If the policy is to remain, the test methodology should be handled in guidance depending on the site and its surroundings, not as a blanket rule in the Natural Resources Plan itself.

- Delete policy WH. R23, which is written in a way that may require resource consent for basic works and emergency maintenance of transport and water networks, and in turn may overload council consenting capacity. If you do not delete this, please remove the reference to a hard shutdown of earthworks over winter and allow appropriate exceptions to this.
- Delete policy P.R24 (which treats earthworks as a non-complying activity and should instead treat it as a restricted discretionary activity).
- Delete policy WH. P31 and P.P29, which dictate hard shutdowns of earthworks sites for four months of the year. This policy will be disastrous for the regional industry, as it will prevent companies from retain earthmoving staff over those months. In turn, this will greatly escalate project cost and the ability for projects to proceed across the region. And if it is applied to sites that are already well-managed, it will create cost and disruption while adding no value. This approach must be reconsidered.
- Consider in P.R31, P.R32, P.R33 water usage for emergency works and essential environmental controls – i.e., dust control.

I also support the rest of the points made in the Civil Contractors New Zealand submission and ask you to consider the impacts this plan change will have on horizontal construction across the region, which will increase costs across the board, including housing, transport and water construction.

Overall, I feel direct consultation with the civil construction industry has been absent in the creation of this plan and is required to make sure the Natural Resources Plan is fit for purpose. Accordingly, I request the plan change does not go ahead.

If you have any further questions, please don't hesitate to contact me direct.

Yours faithfully



Jim Ginty

Managing Director

Multi Civil Contractors Ltd.



E [jim@multicivil.co.nz](mailto:jim@multicivil.co.nz)

## Form 6

### Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

*Clause 8 of Schedule 1, Resource Management Act 1991*

To Greater Wellington Regional Council ("GWRC")

**Name of person making further submission:** New Zealand Carbon Farming Group ("NZCF")

**This is a further submission in support of, and in opposition to, a number of submissions on the Proposed Plan Change 1 to the operative Natural Resources Plan for the Wellington Region ("NRP"), being partly a freshwater planning instrument ("Proposed Plan Change 1").**

NZCF has an interest in Proposed Plan Change 1 that is greater than the interest the general public has, because NZCF:

- has an interest as a landowner and/or occupier in respect of existing and possibly future permanent carbon forests that are potentially affected (directly or indirectly) by the relevant submissions; and
- made a submission on Proposed Plan Change 1.

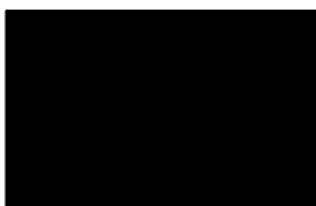
#### **NZCF's further submission**

NZCF's support of, or opposition to, a particular submission including the reason for NZCF's support or opposition and the relief sought are detailed in the table attached as Appendix A.

NZCF seeks that the submissions it supports be allowed or disallowed respectively for the reasons given (or such further alternative relief or amendments as may be necessary to achieve the outcome sought).

**NZCF wishes to be heard in support of its further submissions.**

**If others make a similar submission or further submission, NZCF will consider presenting a joint case with them at a hearing.**



Signature of person authorised to sign  
on behalf of New Zealand Carbon Farming Group

Date: 15 March 2024

<b>Organisation:</b>	<b>Consultant</b>	<b>Submitter</b>
<b>Electronic address for service:</b>	Ainsley McLeod Consulting Limited ainsley@amconsulting.co.nz	New Zealand Carbon Farming Group tayla.westman@nzcarbonfarming.co.nz
<b>Telephone:</b>	[Redacted]	[Redacted]
<b>Postal address:</b>	8 Aikmans Road, Merivale, Christchurch 8014	PO Box 37713, Parnell, Auckland 1151
<b>Contact person:</b>	Ainsley McLeod, Director/Planner	Tayla Westman, Corporate Counsel

## Appendix A – New Zealand Carbon Farming Group: Further Submission on Submissions Made on Proposed Plan Change 1 to the Operative Natural Resources Plan for the Wellington Region

The following table sets out the decisions sought by NZCF in respect of submissions made on the Proposed Plan Change 1, including the reasons for NZCF’s support or opposition in respect of the original submission. The Proposed Plan Change 1 text is shown without underlining; the relief sought in primary submission is shown as black underlined and ~~striketrough~~.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
<b>Alan Bell and Associated (submission number S048)</b>				
S48.003	<p>Schedule 34: Plantation Forestry Erosion and Sediment Management Plan</p> <p>Considers the proposed Plantation Forestry Erosion and Sediment Management Plan, will have detrimental effects on forestry operations and produce negligible water quality improvements.</p> <p>Concerned land used for forestry will be rendered unusable due to highest erosion risk land (HERL) mapping as presented in Map 95.</p> <p>Concerned about the lack of compensation and financial assistance for losses of workable land, broader economic impacts, and permanent woody species required to restore and revegetate HERL. Concerned discontinuing forestry rotations may lead to a decline in investment for roads resulting in poor quality roads and environmental outcomes.</p> <p>Concerned requirements to revegetate HERL do not align with ETS obligations which may result in fees around NZU sequestration.</p> <p>'Questions what in a 'natural state' is and at what point the land was in a 'natural' state. Concerned not all Registered Forestry Advisers will have the expertise to develop plantation Forestry Erosion and Sediment Management Plans that effectively minimises sediment loss.</p>	Support	<p>NZCF generally supports views expressed in the submission for the reasons given, along with the reasons set out in NZCF’s primary submission in respect of Schedule 34.</p>	<b>Allow</b> the submission.
<b>Annette Cairns (submission number S055)</b>				
S055.002	<p>General</p> <p>Concerns rules governing forestry in PC1 would render interest in land incapable of reasonable use citing section 85 of the RMA</p>	Support	<p>NZCF generally supports views expressed in the submission for the reasons given, along with the reasons set out in NZCF’s primary submission.</p>	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S055.003	General – Maps Questions the validity of the mapping techniques used to determine erosion prone land.	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 (“NESCF”).	<b>Allow</b> the submission and replace Maps 92 and 95 with the erosion susceptibility classification in the NESCF.
S055.004	General Believes costs and restrictions of PC1 would make forestry business uneconomic and limit future income	Support	NZCF generally supports the submission and considers that the Section 32 Report does not adequately quantify or address the economic or social costs of Proposed Plan Change 1, including in respect of the New Zealand Emissions Trading Scheme.	<b>Allow</b> the submission.
<b>Ara Poutama Aotearoa the Department of Corrections (submission number S248)</b>				
S248.004	General – Maps Questions the appropriateness of the mapping used to identify where resource consent is required for vegetation clearance, plantation forestry, or earthworks on erosion-prone pasture. Notes the mapping for these features includes numerous small and incohesive areas and submitter questions the efficiency or effectiveness of regulating numerous small (which in many cases measure no greater than 5m by 5m) incohesive areas to manage land stability. Considers maps should be amended to only identify cohesive areas being subject to the rules. In relation to policies, rules, and schedules in relation to plantation forestry, submitter suggests these could be refined to enable plantation forestry operations to continue, particularly where it provides benefits for minimising soil erosion and carbon sequestration. Considers much of Schedule 34 duplicates statutory requirements contained in other documents (particularly the NES-CF) and considers Schedule 34 should be part of a Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 (“NESPF”).	<b>Allow</b> the submission and replace Maps 92 and 95 with the erosion susceptibility classification in the NESPF.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S248.025	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH:P28: Achieving reductions in sediment discharges from plantation forestry</p> <p>Questions feasibility of point (c) of this policy with regard to disparate areas of high erosion risk plantation forestry land identified in Map 92.</p> <p>Notes under this policy, it appears harvesting plantation forestry and replanting in pine is to be avoided. Noting the incentives for replanting provided in section B3 of Schedule 27 (relating to undertaking programmes to actively support revegetation of and sediment management on highest erosion risk land (plantation forestry)), the practicality of replanting in natives can be challenging, and may result in forestry owners not replanting the land at all. Considers replanting with pine still provides benefits for stabilising erosion prone land and considers this policy could be counterproductive.</p> <p>Considers this point would appear to be contrary to the Emissions Trading Scheme, which requires forests are registered to the scheme are replanted after harvesting, as they provide important carbon sequestration benefits.</p> <p>Submitter seeks that point (c) of this policy be deleted and notes this policy would be subject to consequential amendments resulting from the relief it is seeking on Schedule 34.</p>	Support	NZCF generally supports the submission and similarly seeks the deletion of clause (c) for the reasons given in the submission and also for the reasons given in NZCF's primary submission on Policy WH:P28.	<b>Allow</b> the submission.
S248.028	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P31: Winter shut down of earthworks</p> <p>Considers a policy requiring all earthworks over 3,000m<sup>2</sup> to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of prison infrastructure.</p> <p>Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months</p>	Support	NZCF supports the submission and similarly considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	subject to careful management and considers pathway should continue to be available to applicants through consent process.			
S248.040	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22 Plantation forestry on highest erosion risk land – prohibited activity</p> <p>Seeks clarification as to whether prohibition on "earthworks" and "mechanical land preparation" in rule only applies to "afforestation" as defined by NES-CF (i.e. this rule only applies to land where no commercial forestry or harvesting has occurred within the past 5 years), or whether prohibition on "earthworks" and "mechanical land preparation" applies to all new plantation forestry, including re-establishment of recently harvested forests.</p> <p>Considers if rule only applies to new forests as per the definition of "afforestation" in the NES-CF, submitter considers this rule is reasonable.</p> <p>Notes if rule applies to re-establishment of recently harvested forests, submitter considers the Prohibited activity status for this rule is unnecessarily onerous, and evidence in the Section 32 report does not support a Prohibited activity status. Considers there should be a consent pathway for re-establishing plantation forests after harvesting for reasons set out in its requested relief for Policy WH.P28.</p>	Support in part	Subject to the relief sought in NZCF's primary submission, NZCF supports request for clarification of the scope of Rule WH.R22 so that it is clear what activities are being regulated by the Rule.	<b>Allow</b> that part of the submission seeking clarification of the scope of the Rule.
S248.049	<p>Chapter 9 Te Awarua-o-Porirua Whaitua</p> <p>Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.</p> <p>Questions feasibility of point (c) of this policy with regard to disparate areas of high erosion risk plantation forestry land identified in Map 92.</p> <p>Notes under this policy, it appears harvesting plantation forestry and replanting in pine is to be avoided. Noting the incentives for replanting provided in section B3 of Schedule 27 (relating to undertaking programmes to actively support revegetation of and sediment management on highest erosion risk land (plantation forestry)), the practicality of replanting in natives can be challenging, and may result in forestry owners not replanting the land at all. Considers replanting with</p>	Support	NZCF generally supports the submission and similarly seeks the deletion of clause (c) for the reasons given in the submission and also for the reasons given in NZCF's primary submission on Policy P:P26.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>pine still provides benefits for stabilising erosion-prone land and considers this policy could be counterproductive.</p> <p>Considers this point would appear to be contrary to the Emissions Trading Scheme, which requires forests are registered to the scheme are replanted after harvesting, as they provide important carbon sequestration benefits.</p> <p>Submitter seeks that point (c) of this policy be deleted and notes this policy would be subject to consequential amendments resulting from the relief it is seeking on Schedule 34.</p>			
248.052	<p>Chapter 9 Te Awarua-o-Porirua Whaitua Policy P.P29: Winter shut down of earthworks.</p> <p>Oppose Considers a policy requiring all earthworks over 3,000m2 to be shut down over the winter months is inappropriate, as it does not recognise there may be circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of prison infrastructure.</p> <p>Considers there are instances where earthworks are unavoidable at this time, and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff. Notes GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021), which is referred to in the policy, provides a pathway for earthworks to be undertaken during the winter months subject to careful management and considers pathway should continue to be available to applicants through consent process</p>	Support	NZCF supports the submission and similarly considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	<b>Allow</b> the submission.
248.063	<p>Chapter 9 Te Awarua-o-Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land -prohibited activity.</p> <p>Seeks clarification as to whether prohibition on "earthworks" and "mechanical land preparation" in rule only applies to "afforestation" as defined by NES-CF (i.e. this rule only applies to land where no commercial forestry or harvesting has occurred within the past 5 years), or whether prohibition on "earthworks" and "mechanical land preparation" applies to all new plantation forestry, including re-establishment of recently harvested forests.</p>	Support in part	Subject to the relief sought in NZCF's primary submission, NZCF supports request for clarification of the scope of Rule P.R22 so that it is clear what activities are being regulated by the Rule.	<b>Allow</b> that part of the submission seeking clarification of the scope of the Rule.



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers if rule only applies to new forests as per the definition of "afforestation" in the NES-CF, submitter considers this rule is reasonable.</p> <p>Notes if rule applies to re-establishment of recently harvested forests, submitter considers the Prohibited activity status for this rule is unnecessarily onerous, and evidence in the Section 32 report does not support a Prohibited activity status. Considers there should be a consent pathway for re-establishing plantation forests after harvesting for reasons set out in its requested relief for Policy WH.P28.</p>			
<b>China Forest Group Company New Zealand Ltd (submission number S288)</b>				
S288.001	<p>General comments</p> <p>General comments – overall</p> <p>Considers several aspects of PC1 are poorly founded and require considerable research and explanation.</p> <p>Notes the following points of concern:</p> <ul style="list-style-type: none"> <li>- the consultation/representation process is flawed and short-changed, directly impacting sectors.</li> <li>- controls extend beyond the recommendations of whitua committee reports.</li> <li>- rules that apply to forestry that are not supported by GWRC data and past records.</li> <li>- the rules are unable to be implemented without loss of estate due to the spatial logistics of harvesting and roading.</li> <li>- there has been no consideration of the ETA and other cost liabilities contingent upon non-replant of land retired from PC1 rules.</li> <li>- duties under the NES Regulation 6 Stringency insufficiently executed.</li> <li>- the s32 analysis is inadequate.</li> </ul> <p>Remove the sections of PC1 related to forestry. Align rules to those of the NES-CF.</p> <p>Work collaboratively with industry participants and land-owners to implement good practice, and where needed, engage on how to refine and plan land management outcomes that will fulfil the objectives without excessive bureaucracy and cost.</p>	Support	<p>NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. That said, NZCF notes that Rules should not duplicate a National Environmental Standard. NZCF welcomes any opportunity for consultation on Proposed Plan Change 1.</p>	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S288.003	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Notes major disparities between the whitua committee recommendations and PC1 rules. Notes the TAP committee considered more stringent rules for forestry to achieve the sediment objectives, but concluded the permitted framework of NESPF should be given time to be implemented, and that understanding and mapping erosion prone land at the local whitua scale was important to inform future planning. Notes that no recommendations were made by the TAP that plantation forests should be retired, nor the need identified for stringency beyond the (then) NES-PF. Notes that while recognising potential water quality risks from forestry, neither whitua committee recommended an explicit need to retire areas of production forestry. Notes neither whitua committee considered a need for major strengthening of the regulatory regime, but rather recognised the (then) NES-PF and urged a focus on education, "implementation, monitoring and enforcement where necessary. Notes the whitua recommendations sought close liaison between the sector and GWRC land management staff when looking at land use management planning around high-risk erosion sites. Notes neither whitua committee made recommendations to address an explicit link between forestry and water quality attribute standards or objectives.</p>	Support	NZCF supports the submission and considers that greater weight should be given to the whitua committee recommendations in the consideration of the necessity and appropriateness of Proposed Plan Change 1 provisions that relate to forestry.	<b>Allow</b> the submission.
S288.012	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers there is little cognisance in PC1 of the spatial and temporal patterns of harvesting, and the influence this may or may not have on the attribute states of relevant catchments. Considers NPS-FW obligations have been relied on to avoid delaying actions notwithstanding incomplete information. Notes that from the data available, NoF targets were being met in catchments that are largely forested and where harvesting took place and are expected to continue to do so. Considers GWRC has overlooked that in catchments with a relatively small proportion of plantation, and where their reaches aligned with pastoral and urban infrastructure, there were poorer attribute results. Notes this conforms with NZ-wide trends that water</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated alongside monitoring data.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	quality attributes decline in order from undisturbed native forest, exotic forest, pastoral land use and urban. Considers GWRC has assumed that regulations for earthworks and harvesting under the NES-PF have no efficacy toward achieving the goals of the NPS-FW, but at the time of the published data being collected, the NES-PF was new and most of the harvesting that may have contributed to adverse freshwater outcomes had been undertaken in the prior decade. Considers GWRC have not considered that as forests progressed through their first to second rotations, normal practice and NES regulatory requirements saw provision of increased setbacks and retirement and reservation of problematic harvest areas. Concerned that while not all desired data was available, and an absence of such data was not a reason to avoid mitigatory actions, data that was available did not trigger a need or urgency for the whitua committees to recommend significant and stringent changes to the regulatory framework surrounding forestry.			
S288.013	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Concerned with the approach taken to define areas of "high erosion risk" and the application of those findings. Considers it impractical and will result in write-off of much larger areas than estimated by GWRC. Notes that predictions from cutover are likely to significantly overestimated yield in the universal erosion model. Notes research that confirms sediment contributions from poorly controlled earthworks outweigh those from the cutover.</p> <p>Concerned about the use of a lidar surface to inform the mapping of highly erosion prone areas, as lidar surface does not represent the underlying bedrock surface.</p>	Support	NZCF supports the submission and is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF.	<b>Allow</b> the submission.
S288.014	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers the erosion susceptibility layers are based on information that excludes geological considerations and has not been peer reviewed.</p> <p>Considers the 5m<sup>2</sup> resolution of the underlying lidar and the method applied will invariably be wrong, and a poor predictor of stability in the field, leading to areas being retired that were not at risk of slipping, as</p>	Support	NZCF supports the submission and is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF. NZCF supports greater weight being	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>well as areas not being retired that may suffer landsliding in severe weather events.</p> <p>Considers the methodology for "Highest Erosion Risk- Plantation" has led to 'paxilation', which is impractical for forestry activities as rules could enable forestry in one patch and disallow it in an adjacent patch.</p> <p>Notes several factors which determine harvesting feasibility, resulting in more land needing to be retired than suggested in GWRC data.</p> <p>Estimates that in the estate GFG manages, anything from an average of 9% up to 18% might be retired due to PC1 rules.</p> <p>Notes recommendations from whitua committees that could be applied to forestry, including developing site and property level plans with landowners, and funding and support for sediment mitigation activities.</p>		given to the whitua committee recommendations.	
S288.015	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers the total area of compulsory retirement could be substantially greater than assessed by GWRC. Concerned there is the potential for the total write-off of plantation sites, and that this should have been assessed in the s32 analysis.</p>	Support	NZCF agrees that the section 32 evaluation should consider the cost of the total area caused to be retired by the provisions of Proposed Plan Change 1.	<b>Allow</b> the submission.
S288.019	<p>General comments</p> <p>General comments - current legislation</p> <p>Concerned the section 32 report does not adequately demonstrate the need for the stringency proposed in PC1.</p> <p>Submitter references parts of the section 32 analysis which they disagree with.</p> <p>Notes the s32 analysis states forestry is a major land use in the two whitua at 13.5% and 8% respectively and considers these figures unhelpful in isolation from other uses of land, noting it is also stated that the area has recently reached or is nearing commercial maturity, so harvesting is consistently occurring and expected in these FMU.</p> <p>Concerned GWRC have undertaken their section 32 analysis on the basis of a value judgement comparison between their 'preferred' option being PC1, the 'status quo' and an alternative with additional measures which involves option 1 plus a "exposed area" regulation.</p>	Support	NZCF supports the submission for the reasons given and similarly considers that the section 32 evaluation does not demonstrate the appropriateness or necessity for the forestry related provisions in Proposed Plan Change 1.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S288.027	Chapter 2 Interpretation Registered forestry adviser Notes registered members of the NZ Institute of Forestry are automatically also Registered Forestry Advisors. Add sub-clause (d);and includes a Registered Member of the New Zealand Institute of Forestry.	Support	NZCF supports the relief sought.	<b>Allow</b> the submission.
S288.056	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry. Considers the policy enables rules based on insufficient data, is not aligned with whaitua committee recommendations, and is not supported by Council's data. Concerned the rules are not practicable and imply write-off of larger areas and neither the efficacy of the existing regulatory framework under the NES- PF/CF, nor the gains of the proposal, have been adequately identified. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector. Remove policy and reset to recognise substantive deficiencies.	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given.	<b>Allow</b> the submission.
S288.069	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R20: Plantation forestry - controlled activity Considers the rules subvert the intent of the NES- PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre- consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees. Remove rule and align requirement with NES-CF 2023.	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S288.070	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry - discretionary activity.	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the rules subvert the intent of the NES-PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Notes there may be removal of alternate farm land use income opportunities for afforesting land to be taken out of farming. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated.</p> <p>Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whitua committees.</p> <p>Remove rule and align requirement with NES-CF 2023.</p>		effectiveness of the NESCF has been appropriately evaluated.	
S288.071	<p>Chapter 8 Whitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Considers the rules subvert the intent of the NES- PF/CF and are not supported by GWRC data.</p> <p>Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre- consultation and engagement with the forestry sector and ignored the recommendations of the whitua committees.</p> <p>Remove rule and align requirement with NES-CF 2023.</p>	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S288.099	<p>Chapter 9 Te Awarua-o- Porirua Whitua</p> <p>Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.</p> <p>Considers the policy enables rules based on insufficient data, is not aligned with whitua committee recommendations, and is not supported by Council's data. Considers the rules are not practicable and imply write-off of larger areas. Concerned that neither the efficacy of the existing regulatory framework under the NES-PF/CF, nor the gains of the proposal, have been adequately identified. Considers GWRC has</p>	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	acted in bad faith in relation to pre-consultation and engagement with the forestry sector. Remove policy and reset to recognise substantive deficiencies.			
S288.113	Chapter 9 Te Awarua-o- Porirua Whaitua Rule P.R19: Plantation forestry - controlled activity. Considers the rules subvert the intent of the NES- PF/CF and are not supported by GWRC data. Considers efficacy of the existing regulatory framework under the NES- PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre- consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees. Remove rule and align requirement with NES-CF 2023.	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S288.114	Chapter 9 Te Awarua-o- Porirua Whaitua Rule P.R20: Plantation forestry - discretionary activity. Considers the rules subvert the intent of the NES- PF/CF, are not supported by GWRC data, and promulgate uncertainty, delay and cost unquantified benefit. Notes there may be removal of alternate farm landuse income opportunities for afforesting land to be taken out of farming. Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre-consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees. Remove rule and align requirement with NES-CF 2023.	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S288.115	Chapter 9 Te Awarua-o- Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity. Considers the rules subvert the intent of the NES- PF/CF and are not supported by GWRC data.	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Considers efficacy of the existing regulatory framework under the NES-PC/CF has not been adequately identified in the s32 analysis, nor the gains under the proposal. Considers costs to forest owners has been significantly underestimated. Considers GWRC has acted in bad faith in relation to pre- consultation and engagement with the forestry sector and ignored the recommendations of the whaitua committees. Remove rule and align requirement with NES-CF 2023.			
S288.122	Chapter 12 Schedules Schedule 34:Plantation Forestry Erosion and Sediment Management Plan Considers there is overlap with NES-CF, which creates confusion and adds little value. Remove and align and incorporate to NES-CF	Support	NZCF supports the relief sought and agrees that alignment with the NESCF is appropriate.	<b>Allow</b> the submission.
<b>David and Carolyn Gratton (Submission number S058)</b>				
S58.003	General Concerned about timing and costs of preparing erosion plans. Wants to see MPI erosion susceptibility tool used. Considers the mapping used in PC1 is not suitable for determining erosion prone land. Retain the NES-CF and exempt forestry blocks of less than 100ha from the PC1 controlled activity requirements	Support	NZCF supports the submission and similarly considers that the mapping of erosion risk land is not appropriate. Further, NZCF supports the view that the NESCF regulations should apply.	<b>Allow</b> the submission.
S58.004	General – plantation forestry Believes the NES-CF has tighter controls than the NES-PF and should be given time to bed in before controls which go beyond the NES-CF are imposed. The additional requirement to provide an erosion and sediment control plan early in the soil disturbance process is unrealistic and unreasonable. Retain the NES-CF and exempt forestry blocks of less t	Support	NZCF supports the submission because the submission suggests that it would be appropriate for the NESCF to “bed in” before determining whether more stringent provisions are necessary.	<b>Allow</b> the submission.
<b>Donald Love (submission number S102)</b>				
S102.002	Chapter 9 Te Awarua-o-Porirua Whaitua Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	Support in part	NZCF supports the submission to the extent that the submission suggests that the provisions that relate to plantation forestry should be based on a consideration of risks.	<b>Allow</b> the submission in respect of taking a risk-based approach to production forestry.



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Amend Considers risks should be assessed as the impacts of another rotation on tracked and managed land could be worse than other options. Seeks that there be no new forestry on highest erosion land but additional rotations of existing forestry should be considered on impacts			
<b>Dougal Morrison (submission number S003)</b>				
S3.002	General Considers any reference to NES' for Plantation Forestry should be removed and replaced with NES' for Commercial Forestry (NES-CF).	Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Disallow</b> the submission.
S3.003	General Considers the NES-CF should be allowed to bed in before significant changes are made to the NRP.	Support	NZCF supports the submission for the same reasons set out in NZCF's primary submission.	<b>Allow</b> the submission.
S3.005	General Considers GWRC has not provided scientific evidence that forests have caused significant degradation of freshwater quality in the Te Awarua-o-Porirua and Whanganui-a-tara catchments.	Support	NZCF supports the submission and similar shares the view that Proposed Plan Change 1 does not include any evidence or data to support the conclusion that the environment is degraded as a result of the status quo.	<b>Allow</b> the submission.
S3.006	General Considers the proposed erosion classification is unhelpful. Concerned the classification does not express the absolute risk, but rather the risk relative to all other agricultural land. Considers it better to use the ESC classification in the NES-CF.	Support	NZCF supports the submission for the reasons given in NZCF's primary submission.	<b>Allow</b> the submission.
S3.008	General Concerned the Section 32 analysis doesn't justify the changes to forestry management rules.	Support	NZCF supports the submission and shares the view that the Section 32 Report does not include sufficient analysis of the necessity, efficiency or effectiveness of the forestry management rules.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S3.009	General Considers the proposed changes will significantly impact forest investment in the Wellington Region and reduce the benefits from carbon sequestration.	Support	NZCF supports the submission and considers that the Section 32 Report does not quantify the costs of Proposed Plan Change 1, including in respect of employment and the New Zealand Emissions Trading Scheme.	<b>Allow</b> the submission.
S3.012	General Considers GWRC has not provided scientific evidence that forests have caused any significant degradation of freshwater quality. States GWRC's objectives are broad and it will be difficult to determine whether new regulations for forestry will have a positive effect on water quality. Feels GWRC presents a biased view of the role of forestry in the Section 32 report. Considers there is no evidence that more stringent NES-CF will not achieve GWRC's water quality objectives and there is no reason to bring in greater controls than those in the NES-CF.	Support	NZCF generally supports the submission and considers that the Section 32 Report lacks the detail and evidence necessary to support the provisions of Proposed Plan Change 1 that relate to forestry.	<b>Allow</b> the submission.
S3.013	General References recommendations from Te Awarua-o-Porirua WIP and Te Whanganui-a-Tara WIPs and considers these recommendations have not been followed and more complex and expensive regulations are now proposed.	Support in part	NZCF supports the submission and seeks that the recommendations in the Te Awarua-o-Porirua WIP and Te Whanganui-a-Tara Implementation Programmes be accurately and appropriately reflected in Proposed Plan Change 1.	<b>Allow</b> the submission.
<b>Environmental Defence Society Inc (submission number S222)</b>				
S222.001	Chapter 2 Interpretation 'Afforestation' Refer to updated regulations - NES-CF.	Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Disallow</b> the submission.
S222.002	Chapter 2 Interpretation 'Earthworks'	Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with	<b>Disallow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Refer to updated regulations - NES-CF.		reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	
S222.003	Chapter 2 Interpretation 'Harvesting' Refer to updated regulations - NES-CF.	Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Disallow</b> the submission.
S222.004	Chapter 2 Interpretation 'Mechanical land preparation' Refer to updated regulations - NES-CF.	Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Disallow</b> the submission.
S222.006	Chapter 2 Interpretation 'Replanting' Refer to updated regulations - NES-CF.	Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Disallow</b> the submission.
S222.007	Chapter 2 Interpretation 'Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)' Refer to updated regulations - NES-CF.	Oppose	NZCF acknowledges the intent of the submission but considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the	<b>Disallow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			effectiveness of the NESCF has been appropriately evaluated.	
S222.048	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH:P28: Achieving reductions in sediment discharges from plantation forestry To give effect to NPSFM. Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting.	Oppose	NZCF does not support the submission on the basis that the relief sought is not clear in terms of the scope of restrictions sought and no consideration is given to how the relief relates to the NESCF.	<b>Disallow</b> the submission.
S222.060	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R20: Plantation forestry -controlled activity. To give effect to NPSFM and comply with RMA. Make a discretionary or restricted discretionary activity.	Oppose	NZCF opposes the submission on the basis that no rationale or analysis is provided to support a more stringent activity status, including in terms of how a change in activity status is appropriate or necessary to give effect to the NPSFM.	<b>Disallow</b> the submission.
S222.061	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry – discretionary activity To give effect to NPSFM and comply with RMA. Amend as consequence of changes to Rule WH.20	Oppose	NZCF opposes the submission because the relief sought is unclear and on the on the basis that no rationale or analysis is provided in terms of how an amendment is appropriate or necessary to give effect to the NPSFM.	<b>Disallow</b> the submission.
S222.091	Chapter 9 Te Awarua-o-Porirua Whaitua Policy P.P26: Achieving reductions in sediment discharges from plantation forestry. To give effect to NPSFM. Require setbacks, alternative harvesting methods that do not clear fell trees and spatially and/or temporally limit harvesting	Oppose	NZCF does not support the submission on the basis that the relief sought is not clear in terms of the scope of restrictions sought and no consideration is given to how the relief relates to the NESCF.	<b>Disallow</b> the submission.
S222.102	Chapter 9 Te Awarua-o-Porirua Whaitua Rule P.R19: Plantation forestry - controlled activity. To give effect to NPSFM and comply with RMA. Make a discretionary or restricted discretionary activity	Oppose	NZCF opposes the submission on the basis that no rationale or analysis is provided to support a more stringent activity status, including in terms of how a change in activity status is appropriate or necessary to give effect to the NPSFM.	<b>Disallow</b> the submission.
S222.103	Chapter 9 Te Awarua-o-Porirua Whaitua	Oppose	NZCF opposes the submission because the relief sought is unclear and on the on the	<b>Disallow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Rule P.R20: Plantation forestry – discretionary activity To give effect to NPSFM and comply with RMA. Amend as consequence of changes to Rule WH.20		basis that no rationale or analysis is provided in terms of how an amendment is appropriate or necessary to give effect to the NPSFM.	
<b>Forest &amp; Bird (submission number S261)</b>				
S261.089	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry Considers retirement of high risk land is required to achieve water quality outcomes. Considers larger setbacks are required and limits on the area of exposed soil are also required. Include direction that large setbacks are required in areas of plantation forestry and include a cap on the area logged in one harvest (or direct selective harvesting where not all trees are taken out). Retain (c). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Oppose	NZCF opposes the submission on the basis that the submission does not include evidence or justification for the relief sought.	<b>Disallow</b> the submission.
S261.113	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R20: Plantation forestry - controlled activity. Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not be achieved. Considers higher activity status is required. Reclassify as a discretionary activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Oppose	NZCF opposes the submission on the basis that the submission does not provide clear rationale that discretionary activity status is necessary, efficient or effective to implement the policies in the Proposed Plan Change or higher order planning instruments.	<b>Disallow</b> the submission.
S261.115	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity. Supports consistency with the purpose of the RMA. Retain as notified	Oppose	NZCF opposes the submission on the basis that the submission does not explain why the Rule is consistent with the purpose of the RMA.	<b>Disallow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S261.168	Chapter 9 Te Awarua- o-Porirua Whaitua Policy P.P26: Achieving reductions in sediment discharges from plantation forestry. Considers further direction is required to ensure effects are minimised. Include direction that large setbacks are required in areas of plantation forestry and include a cap on the area logged in one harvest (or direct selective harvesting where not all trees are taken out). Retain (c). Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Oppose	NZCF opposes the submission on the basis that the submission does not include evidence or justification for the relief sought.	<b>Disallow</b> the submission.
S261.190	Chapter 9 Te Awarua o-Porirua Whaitua Rule P.R19: Plantation forestry - controlled activity. Considers the inability to refuse consent may mean policy direction under the NPSFM or NZCPS will not be achieved. Considers higher activity status is required. Reclassify as a discretionary activity. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Oppose	NZCF opposes the submission on the basis that the submission does not provide clear rationale that discretionary activity status is necessary, efficient or effective to implement the policies in the Proposed Plan Change or higher order planning instruments.	<b>Disallow</b> the submission.
<b>Forest Enterprises (submission number S111)</b>				
S111.002	General comments General comments – overall Considers Rules WH.R17 to WH.R22 and Rules P.R16 to P.R21 neglect to acknowledge the precedence of the National Environmental Standards of Plantation Forestry (NESPF) and National Environmental Standards of Commercial Forestry (NESCF). NESCF recognises need for flexibility to protect sensitive local environments and notes Regional and District Councils can be more stringent or more lenient but needs to be based on assessments of science and encompasses all environmental, social, and economic factors including those already in place.	Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF, and the necessity for more stringent rules has been appropriately evaluated.	<b>Allow</b> the submission.
S111.003	General comments General comments - current legislation	Support	NZCF supports the submission for the reasons given and considers that Proposed Plan Change 1 should be withdrawn until	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers where councils are proposing a new rule that is more stringent than the NES-PF, there is a requirement to demonstrate the more stringent rule is justified in the context of the region/district in accordance with section 32(4) of the RMA. Notes guidance is also included within the NES-PF Plan Alignment Guidance prepared by MPI.</p> <p>Notes more stringent rules under Regulation 6(1)(a) must firstly to demonstrate the NES-PF controls are not sufficient to achieve a plan objective that gives effect to the NPS-FM and then how a more stringent rule will achieve that objective in a more effective and efficient way than the NES-PF. Suggests roving a link between a proposed rule and a plan objective that gives effect to the NPS-FM is not sufficient.</p> <p>Notes section 32(4) of RMA also requires councils to demonstrate proposed rules (including rules being rolled over as part of a plan review) are justified in the context of the region/district.</p>		such time as the effectiveness of the NESCF has been appropriately evaluated.	
S111.005	<p>General comments</p> <p>General comments – plantation forestry</p> <p>Considers GWRC have ignored statements made by Easton, Nation and Blyth.</p> <p>Considers technical memorandum does not consider land that is replanted back into plantation forestry, the stability that plantation forestry provides by its root structures, wind protection, wildlife habitat that is not found in pastoral landscapes as well as rainfall uptake, all of which reduce erosion and landslides.</p> <p>Considers methodology used to identify landslide risk was over simplified and lacks local information. Considers geology and aspect was not accounted for. Considers the analysis and recommendations unjustified.</p> <p>Expects PC1 to require sediment mitigations on identified erosion risk areas. Considers appropriate mitigation type and extent will vary depending on physical factors such as slope, aspect, site access and pest-control, and non-physical factors such as cost and landowner cooperation.</p> <p>Considers a site-specific assessment, which has same purpose as the required Harvest and Earthworks plans (schedule 4 &amp; 6) of NESCF,</p>	Support	NZCF supports the submission for the reasons given and for the reasons set out in NZCF's primary submission.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>provides more appropriate mitigation measures than the generalised PC1.</p> <p>Considers it unjustified to propose rules that impact land-disturbing activities if they were ignored.</p> <p>Considers intention of Easton, Nation and Blyth technical memorandum has been misused by GWRC as a forementioned, a site-specific field assessment and expert advice prevails.</p>			
S111.006	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers NES-CF has rules and controls for total suspended solids and plantation forestry discharge and seeks justification on how rules in PC1 provide greater positive environmental outcomes.</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S111.008	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers no recommendations from the Waitua committees or the forestry industry have been implemented which reflect the proposed rules for plantation forestry.</p> <p>Notes as acknowledged in the Waitua Committee reports, Regional Councils need to work with forestry groups and contractors to provide support that includes ensuring all forestry operators are aware of relevant regulatory requirements and good practice. Considers lack of evidence that GWRC has engaged forestry groups. Considers implementing new compliance roles does not achieve this recommendation.</p>	Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission. NZCF similarly welcomes the opportunity to consult with the forestry industry.	<b>Allow</b> the submission.
S111.009	<p>General comments</p> <p>General comments – overall</p> <p>Considers environmental outcomes Te-Awarua-o- Porirua and Te-Whanganui-a-Tara have recommended are not reflected by the proposed NRP rules.</p> <p>Considers oversimplifying slope and not factoring forestry activities, yet proposing rules on this basis, is scientifically and logically inconsistent.</p>	Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission. NZCF similarly welcomes the opportunity to consult with the forestry industry.	<b>Allow</b> the submission.



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers whitua recommendations consistent with the National Environmental Standards of Commercial Forestry and provides the site-specific assessments needed.</p> <p>Submitter invite GWRC to consult with forestry industry and evaluate level of stringency that NESCF already provides.</p>			
<b>Greater Wellington Regional Council (submission number S238)</b>				
S238.015	<p>Chapter 8 Whitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry – controlled activity.</p> <p>Notes replanting is an element of commercial forestry that is intended to be included in these rules.</p> <p>Amend as follows:</p> <p>“Afforestation, harvesting, <u>replanting</u>, earthworks, or mechanical land preparation for <del>plantation-commercial</del> forestry,…”</p>	Support	Subject to the relief sought in NZCF’s primary submission, NZCF supports the inclusion of ‘replanting’ in the Rule.	<b>Allow</b> the submission.
S238.016	<p>Chapter 8 Whitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p> <p>Notes replanting is an element of commercial forestry that is intended to be included in these rules</p> <p>Amend as follows:</p> <p>“Afforestation, harvesting, <u>replanting</u>, earthworks, or mechanical land preparation for <del>plantation-commercial</del> forestry,…”</p>	Support	Subject to the relief sought in NZCF’s primary submission, NZCF supports the inclusion of ‘replanting’ in the Rule.	<b>Allow</b> the submission.
S238.017	<p>Chapter 8 Whitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Notes replanting is an element of commercial forestry that is intended to be included in these rules</p> <p>Amend as follows:</p> <p>“Afforestation, harvesting, <u>replanting</u>, earthworks, or mechanical land preparation for <del>plantation-commercial</del> forestry,…”</p>	Support	Subject to the relief sought in NZCF’s primary submission, NZCF supports the inclusion of ‘replanting’ in the Rule.	<b>Allow</b> the submission.
S238.027	<p>Chapter 9 Te Awarua- o-Porirua Whitua</p> <p>Rule P.R19:</p> <p>Plantation forestry - controlled activity.</p>	Support	Subject to the relief sought in NZCF’s primary submission, NZCF supports the inclusion of ‘replanting’ in the Rule.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Notes replanting is an element of commercial forestry that is intended to be included in these rules Amend as follows: "Afforestation, harvesting, <u>replanting</u> , earthworks, or mechanical land preparation for <del>plantation</del> - <u>commercial</u> forestry,..."			
S238.028	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R20: Plantation forestry - discretionary activity. Notes replanting is an element of commercial forestry that is intended to be included in these rules Amend as follows: "Afforestation, harvesting, <u>replanting</u> , earthworks, or mechanical land preparation for <del>plantation</del> - <u>commercial</u> forestry,..."	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	<b>Allow</b> the submission.
S238.029	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity. Notes replanting is an element of commercial forestry that is intended to be included in these rules Amend as follows: "Afforestation, harvesting, <u>replanting</u> , earthworks, or mechanical land preparation for <del>plantation</del> - <u>commercial</u> forestry,..."	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the inclusion of 'replanting' in the Rule.	<b>Allow</b> the submission.
<b>Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust (submission number S210)</b>				
S210.003	General comments General comments - plantation forestry The submitter considers the NES-CF provides a consistent and clear process for forestry practitioners to manage forestry operations, including on sites susceptible to erosion. The submitter is concerned the provisions included in PC1 add additional layers of requirements in policies and rules that are more restrictive to the updated NES-CF that are unjustified and unwarranted, and not required to implement the objectives of the NRP or NPS-FW. Considers these additional provisions will cause additional costs and delays, and potential confusion around which rules need to be considered on site. The submitter has reviewed and considered the proposed changes and does not see the proposed	Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. Further, NZCF considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>standards helping to manage more effectively the resource management issues encountered with commercial forestry. PC1 also provides for additional management practices and documentation for erosion and sediment control processes which are not occurring within 10m of a water body on areas identified by GWRC as having highly erodible soil. The level of assessment under Schedule 34 is above and beyond what is required under the NES-CF and are onerous and unnecessary for managing commercial forestry resource management issue.</p> <p>The requirement to progressively reduce and cease plantation (commercial) forestry beyond the next harvest on the highest erosion risk land and then to provide an objective to restore and revegetate the site, with a presumably native permanent woody species, is also strongly opposed. The submitter considers prohibiting forestry activity after the last harvest and then dictating through the schedule to not be able to consider other land uses for the site is a totally inappropriate use of the plan making tools available to manage resource management issues. It is an over-reaction and does not take into account the costs and benefits of this change in land use and property rights of land owners who undertake a forestry business on the land. There appears to have been no consultation with the Region's forestry industry in development of these provisions despite the significant impact it will have on the industry, the submitter's own operator was not consulted as well as many of its contracting crews.</p> <p>The submitter also notes there are also a number of definitions which incorrectly refer to the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017. This incorrect reference is used throughout the PC1 provisions. This name was changed to the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 on 03 November 2023, by regulation 4 of the Resource Management (National Environmental Standards for Commercial Forestry) Amendment Regulations 2023.</p> <p>Furthermore the submitters note the term 'plantation forestry' is used throughout PC1 and is not defined. References to 'plantation forestry' in the NES-CF have been changed to 'commercial forestry' as part of the</p>			

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>amendment regulations, and for consistency PC1 should reflect these changes.</p> <p>Finally, the submitters have identified that the 'Note' following Rule WH.R19 on page 98 of PC1 incorrectly references the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 instead of the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 (updated November 2023). Seeks the following:</p> <p>NES-CF is used as the basis of management of commercial forestry in the Wellington region and the rules restricting plantation (commercial) forestry rules are deleted;</p> <p>Correctly refer to the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 (Updated 3 November 2023);</p> <p>Correctly refer to 'commercial forestry' to be consistent with the updated NES-CF;</p> <p>Correct the Note after Rule WH.R19 on page 98 to refer to the NES-CF.</p>			
S210.007	<p>Chapter 2 Interpretation</p> <p>Highest erosion risk land (plantation forestry)</p> <p>Opposes mapping of 'highest erosion risk land (plantation forestry)' and 'highest erosion risk land (woody vegetation)'. Notes the NES-CF uses a different erosion susceptibility classification tool that divides the NZ landscape into 4 erosion categories: green (low) and yellow (moderate) - land less likely to erode where commercial forestry activities are permitted (subject to conditions being met);</p> <p>Orange (high risk) and red (very high risk) - land more likely to erode where most forestry activities can't be carried out on red-zoned land without resource consent, and some activities such as earthworks also require consent on orange-zoned land.</p> <p>Using this classification the submitters land is zoned green and yellow on the Ministry of Primary Industries (MPI) mapping of areas, meaning forestry activity is permitted under the NES-CF subject to meeting conditions. This classification seems to be in direct conflict to the maps</p>	Support in part	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF. That said, NZCF considers that merely replacing references to the NESPF with reference to the NESCF is not sufficient.	Subject to the relief sought in NZCF's primary submission, <b>allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>prepared by GWRC which include 'highest erosion risk land (plantation forestry)' over the submitters land. The submitter therefore questions why there is such a variation in the classification of their site, and consider it is more appropriate for commercial forestry on its land to be managed through the NES-CF. Considers the quality of the mapping is poor and difficult to tell where the areas shown on Maps 94 and 95 start and finish on the submitter's site due to the pixelation that occurs when zooming in on a particular area. This poor mapping quality needs to be resolved so land users are able to determine where these areas are on their property, and the poor mapping could cause GWRC compliance issues at a later date. Considers it not possible for individual submitters to determine the extent their land is affected and to make a submission, this mapping should be redone and that aspect of the plan re-notified.</p> <p>Seeks the following:</p> <p>The management of commercial forestry activities on the submitters land be undertaken in accordance with the erosion susceptibility classification tool and the requirements of the NES-CF;</p> <p>That these PC1 definitions and provisions be deleted or the NRP be amended to be consistent with and take the same approach as the NES-CF - a more restrictive approach is not justified;</p> <p>Mapping of 'highest erosion risk land (plantation forestry)' and 'highest erosion risk land (woody vegetation)' to be improved to a higher quality so that when zooming in on a site on the map a resource user can easily determine where the relevant areas are located on a site.</p>			
S210.034	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.</p> <p>Oppose intent of Policy WH.P28 that has direct relevance to their commercial forestry operations, and results in the introduction of prohibited activity Rule WH.R22. As previously discussed in Submission Point #3 of the original submission, the submitter seeks commercial forestry activities to be managed through NES-CF which they consider are appropriate and justified. The submitter also raises the question of the differences in the mapping of erosion risk land in Submission Point #5 of the original submission and the quality of the mapping which is</p>	Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>poor and is difficult to tell where the high erosion risk land (plantation (commercial) forestry) areas shown on Map 95 start and finish on the submitter's site due to the pixelation that occurs when zooming in on a particular area.</p> <p>Oppose Clause (c) that seeks to prohibit new and continuing (after harvesting) of plantation (commercial) forestry on highest erosion risk land (plantation forestry), which leads to prohibited activity Rule WH.R22. The submitters note the intent of Clause (c) is carried through into Schedule 34, as discussed later in this submission. Oppose the use of prohibited activity rules for the reasons given in PART ONE of the original submission. The submitters do not consider the implementation of the PC1 objectives requires or justifies the use of a prohibited activity rule approach and that the provisions of the NES, NPS-CF are more appropriate.</p> <p>Mapping of 'highest erosion risk land (plantation forestry)' be deleted, or amended and improved to a higher quality so that when zooming in on the map a resource user can easily determine where the areas are located on a site; Deletion of Clause (c).</p>		time as the effectiveness of the NESCF has been appropriately evaluated.	
S210.048	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity.</p> <p>Oppose the controlled activity status for plantation (commercial) forestry not on high erosion risk land (pasture) or highest erosion risk land (pasture) subject to the conditions and matters of control listed as they consider the matters being provided for by the rule are already appropriately controlled through the NES-CF, which has just been through a review process and has been updated accordingly. The submitters do not consider there is any justification for PC1 addressing these matters as this adds a further layer of unnecessary bureaucracy and seek the rule to be deleted in its entirety.</p> <p>Should GWRC decline this submission point, would seek Rule WH.R20 to be amended to be consistent with, and not more restrictive than, the NES-CF. Also seek the better mapping as addressed in Submission Point #3 of the original submission, and the submitter is opposed to this rule being allocated to the FPP process given that it does not directly relate</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. That said, NZCF notes that Rules should not duplicate a National Environmental Standard.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>to freshwater and is relevant to Forestry NPS and NPS-IB should properly be part of the schedule 1 process.</p> <p>Delete Rule WH.R20; or as an alternative if it is retained; Amend Rule WH.R20 to be consistent with, and not more restrictive than, the provisions of the NES-CF; and address the mapping issues identified in Submission Point #3 of the original submission, and Remove Rule WH.R20 from the allocation of the provision from the FPP.</p>			
S210.049	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p> <p>Oppose the discretionary activity status for plantation (commercial) forestry that do not comply with one or more of the conditions of Rule WH.20. Consider the matters being provided for by the rule are already appropriately controlled through the NES-CF, which has just been through a review process and has been updated accordingly. Do not consider there is any justification for PC1 addressing these matters as this adds a further layer of unnecessary bureaucracy and seek the rule be deleted in its entirety.</p> <p>Should GWRC decline this submission point, seek the activity status for Rule WH.R21 be changed to restricted discretionary activity, with the matters of discretion restricted to the one or more conditions of Rule WH.R20 that cannot be met. The rule should be amended to be consistent with, and not more restrictive than, the NES-CF.</p> <p>As discussed in Submission Point #4 of the original submission, the submitter is also opposed to this rule being allocated to the FPP process given that it does not directly relate to freshwater and is relevant to Forestry NPS and NPS-IB should properly be part of the schedule 1 process.</p> <p>Delete Rule WH.R21; or as an alternative and if it is retained;</p> <p>Amend the activity status of Rule WH.R21 to restricted discretionary activity, with the matters of discretion restricted to the one or more conditions of Rule WH.R20 that cannot be met, and to be consistent with, and not more restrictive than, the provisions of the NES-CF; and Remove Rule WH.R20 from the allocation of the provision from the FPP.</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. That said, NZCF notes that Rules should not duplicate a National Environmental Standard.	<b>Allow</b> the submission.
S210.050	Chapter 8 Whaitua Te Whanganui-a-Tara	Support	NZCF supports the submission for the reasons given in the submission and in	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Opposes Rule WH.R22. As discussed in PART ONE of the original submission, including the prohibited activity status is onerous and not justified by the objectives included in PC1, and any adverse effects of a plantation (commercial) forestry can be considered through a the NESCF provisions, and such an onerous rule will adversely affect the viability of forestry industry in the Region. Considers this approach is not justified, there has been no consultation or engagement with industry and little evidential basis in the s32 to support this approach. There also appears to be little consideration of the need to plant slopes to prevent erosion and the cost of doing so, without a return which will impose a significant burden on submitters. Seek the deletion of Rule WH.R22 in its entirety.</p> <p>Delete WH.R22</p>		NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	
S210.054	<p>Chapter 12 Schedules</p> <p>Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.</p> <p>Consider Schedule s34 requirements for sediment management plans related to commercial forestry erosion overly onerous and would cause significant costs and potential delays in getting the management plan approved. Consider the sediment management plan requirements should reflect the sediment management approach included in the NES-CF.</p> <p>Particularly opposes the requirements of Management Objective 4 which is implemented through Clause (c) of WH.P28.</p> <p>Re-write the sediment erosion plan requirements to better reflect the management requirements of the NES-CF, and in particular delete 'Management Objective 4' in any re-write.</p>	Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
<b>John Turkington Limited (submission number S237)</b>				
S237.002	<p>General comments</p> <p>General comments - current legislation</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the	<b>Allow</b> the submission.



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Concerned lack of evidence and justification for forestry restrictions and how NES-CF controls are insufficient for managing forestry and associated effects.		effectiveness of the NESCF has been appropriately evaluated.	
S237.003	General comments General comments - current legislation Considers PC1 duplicated existing controls under NES-CF including use of erosion mapping and management plan requirements.	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S237.004	General comments General comments - economic cost/impact Concerns with lack of evidence provided by GW on environmental effects from forestry.	Support	NZCF supports the submission and similarly considers that the provisions relating to forestry must be supported by evidence.	<b>Allow</b> the submission.
S237.005	General comments General comments - current legislation Promotes the correct application of stringency under the NES-CF for specific additional controls to the existing NES-CF framework to address water quality concerns, as the preferred approach and an alternative to the PC1 consented regime proposed.	Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S237.008	General comments General comments – overall Notes importance that policies, objectives or rules related to commercial forestry are supported by appropriate empirical evidence. Considers the collaboration reports suggests no scientific relationship between erosion risk, sediment delivery (connectivity), sediment yield, or receiving environment target state attributes, such as visual clarity. Question how spatial model of erosion risk can apply as a tool for managing water quality from land used for commercial forestry operations, particularly without any evidence GWRC having given due consideration to existing literature on connectivity and sediment yield. Opposes rules related to identified highest erosion risk land, land use and discharge consent thresholds, and erosion and sediment management plans, as they relate to commercial forestry activities and	Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF is similarly concerned that the rationale for, and detail of, the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESCF. It is NZCF's view that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>do not consider management practices beyond erosion risk, and are already adequately controlled for within NES-CF.</p> <p>Considers the Section 32 Report, does not provide evidence or justify that existing commercial forestry contributes to sedimentation and current forestry management practices and the regulatory framework are not adequate to address the improvements needed. Considers councils data suggests the existing regime controlled by NES-CF does not appear to contribute any additional sediment that would be necessary to address to achieve water clarity targets within catchments monitored with that land use."</p>			
S237.009	<p>General comments</p> <p>General comments - water quality improvements</p> <p>Seeks rules must be consistent with existing operating framework of NES-CF.</p> <p>Notes the sediment discharge provisions of the NES-CF form an important component of the permitted activity standards for forestry earthworks under the current regulatory regime, and apply irrespective of the identified erosion susceptibility of the land.</p> <p>Considers Council has overlooked role of water quality standards (namely permitted activity discharges) already provided for by NES-CF. Questions if further deviation from standards currently expressed by the National Standards is necessary or defensible.</p> <p>Considers as well as unnecessarily overriding existing discharge standards of NES-CF, PC1 is also duplicating existing requirements of National Standards for forestry operations to have a management plan address erosion and sedimentation from land disturbing activities.</p> <p>Considers as well as unnecessarily overriding existing discharge standards of NES-CF, PC1 is also duplicating existing requirements of National Standards for forestry operations to have a management plan address erosion and sedimentation from land disturbing activities.</p> <p>Considers there is no evidence provided in Council reports that current NES-CF framework for managing erosion, sediment, and water quality is deficient either in current monitoring data or desired future state. Also notes no evidence provided by Council that existing Forestry Earthworks</p>	Support	<p>NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. That said, NZCF notes that Rules should not duplicate a National Environmental Standard.</p>	<p><b>Allow</b> the submission.</p>

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	and Harvest Management Plans within NES-CF is insufficient for managing forestry activities. Seeks rules must be consistent with existing operating framework of NES-CF.			
S237.010	<p>General comments</p> <p>General comments - current legislation</p> <p>Notes PC1 must be implemented in accordance with statutory provisions. Notes National Environmental Standards take primacy over Plan rules unless the standards expressly provide otherwise, and PC1 should complement existing NES-CF framework and only introduce more stringent rules where necessary to achieve an objective developed to give effect to NPS-FM. Concerned current provisions seek to replace the current permitted activity approach of National Instruments leading to regulatory inconsistency. Notes whilst regulation 6 of NES-CF allows for a council to provide more stringent rules to meet an objective giving effect to NPS-FM, there is a process to be undertaken by council to justify any application of stringency, refers to Section 32 (4) of RMA.</p> <p>Submitter considers none of the proposed changes necessary, or validly justified. Considers Council has not undertaken any of its own research into how NES-CF provisions have been operating and has failed to provide evidence to support these proposed changes, including evidence to show current regulatory regime is not sufficient to achieve a plan objective.</p> <p>Suggests proposed or amended policies, objectives or rules of PC1 as they relate to commercial forestry are not necessary or appropriately justified in accordance with the statutory provisions of Section 32(4) of RMA that apply to this type of plan change.</p>	Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S237.011	<p>General comments</p> <p>General comments - current legislation</p> <p>Considers NES-CF sufficient for managing forestry activities and notes Council have not provided any evidence contrary to this.</p> <p>Seeks Council should provide evidence that NES- CF is insufficient to meet the objectives for water quality, ecosystem health and mana</p>	Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>whenua values in these FMUs before looking to pursue this plan change process further.</p> <p>Alternatively, seeks Council utilise stringency ability under NES-CF to develop more stringent rules for specific controls, noting Council must provide evidence to show the NES-CF controls are not sufficient to achieve a specific plan objective to give effect to NPS-FM in order to apply a more stringent rule.</p> <p>Council provide evidence that NES-CF is insufficient to meet the objectives for water quality, ecosystem health and mana whenua values before progressing with PC1.</p> <p>Alternatively, Seeks Council should utilise stringency ability under NES-CF to develop more stringent rules for specific controls.</p>			
<b>Juken New Zealand (submission number S191)</b>				
S191.001	<p>General comments</p> <p>General comments- overall</p> <p>Concerns about:</p> <p>The extension of controls beyond the recommendations of the Waitua committee WIP reports.</p> <p>No consideration for ETS implications with the removal of land from production.</p> <p>Inadequate Section 32 analysis</p> <p>Deficient application of NES-CF Regulation 6 for enforcing more stringent rules.</p> <p>Impracticalities of the erosion mapping and definition of high erosion.</p>	Support	NZCF supports the submission in its entirety for the reasons given and also for the reasons in NZCF's primary submission.	<b>Allow</b> the submission.
S191.003	<p>General comments</p> <p>General comments - current legislation</p> <p>Notes the NES-PF and NES-CF are part of the government's suite of regulations that help meet the objectives of the NPS-FM. Is unaware of any evidence that the NES-PF is not meeting the intended outcomes for the Wellington Region and sees no reason why the NES-CF would not continue to do so.</p> <p>Refers to regulation 6 of the NES-CF which allows for a council to provide more stringent rules to meet an objective giving effect to the</p>	Support	NZCF supports the submission in its entirety for the reasons given and also for the reasons in NZCF's primary submission.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>NPS-FM but notes there is a process to be undertaken by the council to justify any application of stringency, and refers to Section 32 (4) of the RMA.</p> <p>Considers proving a link between a proposed rule and a plan objective that gives effect to the NPS-FM is not sufficient to meet Regulation 6(1)(a).</p> <p>Considers the Section 32 report: Part A - Background and Context (para 88) does not provide any evidence that the enforcing of more stringent rules will deliver better outcomes than the NES-CF. Notes that neither of the two Waitua committees recommended that the NES - PF was insufficient to meet fresh water targets.</p>			
S191.004	<p>General comments</p> <p>General comments – plantation forestry</p> <p>Considers the definition of erosion risk on forestry land in the Erosion Risk Mapping for Te-Awarua-o- Porirua and Te-Whanganui-a-Tara report is flawed, as it does not resemble that erosion risk is significantly lower on land with tree cover than pasture land.</p> <p>Considers there is no logic that defining and removing the top 10% of highest erodible forestry land from production would lead to better outcomes for fresh water, and that no consideration has been given to Emission Trading Scheme (ETS) implications for forestry land that has been categorised in the top 10% of the highest erosion land. Notes that land that can't be replanted will lead to liabilities under the ETS.</p> <p>Notes that replanting is included in the Section 32 report but was an omission in the draft plan as an oversight by the GWRC. Considers this should have been rectified by updating the draft plan rather than waiting on submissions as submitters maybe unaware of the replanting omission.</p> <p>Concerns that the pixelated quality of maps 92 and 95 will result in more land then necessary written off.</p>	Support	NZCF supports the submission in its entirety for the reasons given and also for the reasons in NZCF's primary submission.	<b>Allow</b> the submission.
<b>Kāinga Ora (submission number S257)</b>				
S257.074	<p>Chapter 13 Maps</p> <p>Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o- Porirua.</p>	Support	NZCF supports the submission to the extent that the submission identifies that the Map is not readily understood at a site level	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level.</p> <p>Considers that a definition for 'High and Highest Erosion Risk Land' is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps.</p> <p>Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules.</p> <p>Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.</p>			
S257.077	<p>Chapter 13 Maps</p> <p>Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara.</p> <p>Generally supports the identification of land where it is subject to a proposed planning framework that seeks to manage land-uses upon identified High and Highest Erosion Risk Land, but considers the maps are not readily understood at the site-based level.</p> <p>Considers that a definition for 'High and Highest Erosion Risk Land' is more appropriate to capture those areas of land subject to the corresponding rules rather than high level maps.</p> <p>Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules.</p> <p>Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.</p>	Support	NZCF supports the submission to the extent that the submission identifies that the Map is not readily understood at a site level	<b>Allow</b> the submission.
<b>Louise Askin (submission number S009)</b>				
S9.025	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity.</p> <p>Considers it is unclear whether mapping is fit for purpose and suggests comparing against best practice mapping tools. Considers forestry is an</p>	Support	NZCF supports the submission for the reasons given and for the reasons in NZCF's primary submission.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>effective soil conservation tool on erosion prone land, dependent on the severity of erosion risk and forestry type.</p> <p>Suggests prioritising productive/protective options for erosion prone land where suitable. Notes in Mākara/Ohariu, pine is one of the only tree species that will grow in wind exposed areas (other than low native scrub).</p> <p>Review whether mapping is fit for purpose.</p>			
<b>New Zealand Farm Forestry Association (NZFFA) (submission number S195)</b>				
S195.001	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers PC1 is biased against forestry. Notes Council monitoring demonstrates that water quality for catchments with significant forest cover is generally better water quality compared with other land uses.</p> <p>Concerned PC1 will cause a significant decline in commercial forest activity in the Wellington region which, in turn, will impact the regional economy, make it harder to meet climate change targets, and may lead to negative environmental effects.</p>	Support	NZCF supports the submission and similarly acknowledges that Council monitoring does not support the approach taken in the Proposed Plan Change.	<b>Allow</b> the submission.
S195.008	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers the council has not provided evidence to support claims within the S32 report forestry is responsible for the "current degraded state" of water bodies.</p> <p>Considers there is no evidence that the NES-PF failed to achieve the water quality standards of Greater Wellington, nor any evidence that the new, more stringent NES-CF will fail. Notes if PC1 is adopted, it would be impossible to determine whether or not the new regulations for forestry resulted in any discernible improvements in water quality.</p> <p>Considers without such evidence, there is no reason to undercut a national environmental standard.</p>	Support	NZCF supports the submission for the reasons given in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S195.010	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers GWRC have not provided forestry specific evidence related to the Wellington region that demonstrates the NES-PF (and now the NES-</p>	Support	NZCF supports the submission and similarly considers that there is no evidence to justify the rules, particularly with the NESCF is	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>CF) does not give effect to a specific objective developed to give effect to the NES-FW. Considers there is no justification for the proposed new forestry rules.</p> <p>Considers GWRC have not provided forestry specific evidence to show the new rules will achieve improvements in terms of any particular objective developed to give effect to the NES-FM. Notes there is no defined link between the proposed more stringent rules and a particular objective. By contrast, there is plenty of evidence that plantation forestry as a land use leads to reduced sediment loads and improved water quality.</p> <p>Suggests that what is proposed does not comply with regulation 6.1 in the NES-CF.</p>		intended to address the effects of commercial forestry.	
S195.018	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Disagrees with the assessment for options 1, 2 and 3 in the s32 report. Considers there is no basis for the claim that sediment generated by plantation forestry is a problem within the Greater Wellington area because of the regulations governing forestry.</p> <p>Considers there is no evidence of the NES-PF generating worse environmental outcomes in the Wellington area than the pre-2018 consenting regime, nor is there evidence that either forestry or the NES-PF is responsible for the 'current degraded state' of water bodies in the region.</p> <p>Notes there are studies showing that over the course of a whole rotation, commercial forestry is much better than many other land uses at minimising sediment flows. An example is the Pakuratahi paired-catchment study.</p> <p>Contend that the environmental benefits of the three options are equal.</p>	Support	NZCF supports the submission and similar considers that the section 32 evaluation do not include sufficient evidence to support the provisions that relate to commercial forestry.	<b>Allow</b> the submission.
S195.022	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Notes the analysis appears subjective rather than based on evidence or research. Considers making plantation forestry a controlled activity with 10% of the land to be retired will reduce the amount of land in forestry and may not improve water quality but reduce it.</p>	Support	NZCF supports the submission and shares the view that there are more effective ways of improving water quality when compared to the proposed approach to commercial forestry.	<b>Allow</b> the submission.



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Considers there are more effective ways of improving water quality than those proposed under PC1.			
S195.025	<p>General comments</p> <p>General comments – maps</p> <p>Notes in the 2023 report by Easton Nation and Blyth, Forestry erosion risk is based on potential erosion risk on land currently in forestry should that land be converted to pasture. Consider the measure of erosion risk used is questionable as replanting forestry has a lower erosion risk than converting land to pasture.</p> <p>Considers the mapping resulting from the report by Easton Nation and Blyth is not useful for managing a forest, as it uses 5m by 5 m pixels when forests are managed to the nearest 0.5 ha. Suggests the mapping would have required at least a contiguous size of 0.5 ha for each class of risk to be credible.</p>	Support	NZCF supports the submission and has similar concerns about the accuracy and usability of the maps.	<b>Allow</b> the submission.
S195.029	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry – controlled activity.</p> <p>Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.</p> <p>Delete rules in PC1 that are more stringent than the NES- CF</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S195.030	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p> <p>Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.</p> <p>Delete rules in PC1 that are more stringent than the NES- CF</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S195.031	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven.</p> <p>Delete rules in PC1 that are more stringent than the NES- CF</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S195.032	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R19:</p>	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Plantation forestry - controlled activity. Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven. Delete rules in PC1 that are more stringent than the NES- CF		withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	
S195.033	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R20: Plantation forestry - discretionary activity. Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven. Delete rules in PC1 that are more stringent than the NES- CF	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S195.034	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity. Considers PC1 rules should not override The National Environmental Standards for Plantation Forestry (NES-PF) until that need is proven. Delete rules in PC1 that are more stringent than the NES- CF	Support	NZCF supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S195.035	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives. Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Support	NZCF supports the submission and particularly notes that the Policy fails to consider the role the NESPF (and NESCF) play in appropriately managing activities (as a higher order planning instrument).	<b>Allow</b> the submission or revise to reflect the role of the NESCF.
S195.036	Chapter 9 Te Awarua- o-Porirua Whaitua Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives. Object to policies WH.P2, P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.	Support	NZCF supports the submission and particularly notes that the Policy fails to consider the role the NESPF (and NESCF) play in appropriately managing activities (as a higher order planning instrument).	<b>Allow</b> the submission or revise to reflect the role of the NESCF.
S195.040	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R19: Plantation forestry - controlled activity. Considers these rules impractical for the following reasons: Considers the rules are unnecessarily harsh as when a heavy rain event leads to the visual clarity exceeding the target condition at a single measurement site in the catchment, no further afforestation can take place until all measurement sites show acceptable values again.	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the rules create an anomaly as pasture areas with a high erosion risk must be retired to woody vegetation regardless of water clarity.</p> <p>However, if water clarity is poor, rules may prevent planting trees in non-erosion-prone forest land within the same catchment.</p> <p>Notes A FMU may cover several distinct catchments but with only one measurement point. Considers a failure of visual clarity in one catchment should not affect the consented right to plant in another catchment within the same FMU. Suggests the rules are too broadly drafted.</p> <p>Should neither the plan change process nor the courts accept the removal of Rule P.R19 and Rule WH.R20 for afforestation activities, it is requested that for afforestation activities conditions (c) and (d) be removed from Rule P.R19 and Rule WH.R20.</p>			
S195.041	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity</p> <p>Considers the classification of land as high or highest risk does not express the absolute risk, but rather the risk relative to all other land with the same land use. The submitter notes a block of grazing land, adjacent to an existing forest on the same type of land could be classified as highest risk while the forests next to it would not. Considers this would prevent the agricultural land from being afforested despite the change resulting in higher water quality. Considers the relative assessment of risk is commercially and environmentally unsound, and appears biased against forestry.</p> <p>Considers for forestry, the information requirements in Schedule 34 such as details may not be known because forests are generally harvested when they are between 25 and 60 years old when harvesting or management techniques may have evolved.</p> <p>Questions why the information requested is required.</p> <p>Considers planting trees does not significantly increase the erosion risk or sediment discharge from land and planting timber trees has no greater effect on water quality than planting apple trees or</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>cabbages. Due to this, there is considered to be no benefit in requiring an erosion and sediment management plan certified by a registered Forestry Adviser.</p> <p>As the RMA requires policies and rules to be effects based, it is considered these rules do not appear to comply.</p> <p>Remove afforestation from P.R.19 and WH.R20</p> <p>Should neither the plan change process nor the courts accept this submission point it is requested that for afforestation activities, Rule P.R19 (b) and Rule WH.R20 (b) be removed and the ESC classification of erosion risk used in the NES-CF be applied.</p>			
S195.042	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity."</p> <p>Considers these rules impractical for the following reasons:</p> <p>Considers the rules are unnecessarily harsh as when a heavy rain event leads to the visual clarity exceeding the target condition at a single measurement site in the catchment, no further afforestation can take place until all measurement sites show acceptable values again.</p> <p>Considers the rules create an anomaly as pasture areas with a high erosion risk must be retired to woody vegetation regardless of water clarity.</p> <p>However, if water clarity is poor, rules may prevent planting trees in non-erosion-prone forest land within the same catchment.</p> <p>Notes A FMU may cover several distinct catchments but with only one measurement point. Considers a failure of visual clarity in one catchment should not affect the consented right to plant in another catchment within the same FMU. Suggests the rules are too broadly drafted.</p> <p>Should neither the plan change process nor the courts accept the removal of Rule P.R19 and Rule WH.R20 for afforestation activities, it is requested that for afforestation activities conditions (c) and (d) be removed from Rule P.R19 and Rule WH.R20.</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S195.045	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R20: Plantation forestry - discretionary activity</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the classification of forest land as ""highest risk"" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES- CF.</p> <p>Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m<sup>3</sup>. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m<sup>3</sup>. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land.</p> <p>Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification.</p> <p>Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment.</p> <p>Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23.</p> <p>Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment.</p> <p>Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.</p>		<p>that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.</p>	

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements.</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22</p>			
S195.046	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R19: Plantation forestry - controlled activity</p> <p>Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES- CF.</p> <p>Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m<sup>3</sup>. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m<sup>3</sup>. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land.</p> <p>Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification.</p> <p>Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment.</p> <p>Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23.</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment.</p> <p>Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22.</p>			
S195.047	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.</p> <p>Considers the classification of forest land as ""highest risk"" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES- CF.</p> <p>Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m3. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land.</p> <p>Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse</p>	Support	<p>NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.</p>	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>conditions and will likely not carry the risk associated with such a certification.</p> <p>Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment.</p> <p>Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23.</p> <p>Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment.</p> <p>Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22</p>			
S195.048	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity</p> <p>Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES- CF.</p> <p>Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m<sup>3</sup>. Notes, during moderate</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m<sup>3</sup>. Considers that as this limit is" routinely breached on Council or DOC land, there is no justification to apply it to private land.</p> <p>Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification.</p> <p>Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment.</p> <p>Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23.</p> <p>Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment.</p> <p>Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22</p>			

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S195.049	<p>Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry - discretionary activity."</p> <p>Considers the classification of forest land as ""highest risk"" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES- CF.</p> <p>Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m3. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m<sup>3</sup>. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land.</p> <p>Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification.</p> <p>Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment.</p> <p>Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23.</p> <p>Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment.</p> <p>Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>his legal obligations. Concerned there is no provision in the rules for appealing such a situation.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22.</p>			
S195.050	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Considers the classification of forest land as "highest risk" is a relative rather than absolute assessment. Objects to the proposed classification and seeks it be replaced with the Erosion Susceptibility Classification (ESC) used in the NES- CF.</p> <p>Considers no reasoning or scientific evidence has been provided to justify the discharge limit of 100 grams /m<sup>3</sup>. Notes, during moderate rainfall, unsealed roads or a recent small slip will discharge more than 100gm/m<sup>3</sup>. Considers that as this limit is routinely breached on Council or DOC land, there is no justification to apply it to private land.</p> <p>Contends that the proposed discharge limits will make any harvesting or earthworks impossible as a controlled activity. Notes the rules require the landowner to provide a certified Erosion and Sediment Management Plan that shows all activities will meet the discharge standard in Rule P.R19 (c) and Rule WH.R20 (c). As the discharge limit applies even in adverse conditions, the submitter considers it will be impossible for any certifying authority to guarantee full compliance under adverse conditions and will likely not carry the risk associated with such a certification.</p> <p>Questions why Rules R.P19, P.20, and P.R21 are not consistent with Rule R.P22 which adopts the NES-CF approach of requiring the use of best practice standards to minimise the discharge of sediment.</p> <p>Questions how, given that discharges from earthworks are much higher than discharges from forestry, there could be a more rigid limit for</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>forestry activities than earthworks. Notes the same also applies to rule Rules WH.R20, WH.R21, and WH.R22 in comparison the Rule WH.R23.</p> <p>Considers there are issues with Clause (d) which states for a harvesting consent the visual clarity measurement target must be met at each monitoring site in the relevant part FMU. Notes some waterbodies in a part FMU do not drain into a catchment which is monitored by a measurement point. Considers forest owners should not be penalised for something that happens in an unrelated catchment.</p> <p>Notes a possibly illegal discharge of sediment by a third party could prevent a forest owner from being able to harvest, despite meeting all his legal obligations. Concerned there is no provision in the rules for appealing such a situation.</p> <p>Replace the erosion risk classification used in PC1 and its Schedules with the ESC used in the NES-CF</p> <p>Remove Clause C1 (c) (iii) and clause C2 from the Erosion and Sediment Management Plan requirements.</p> <p>Remove Clauses (c) and (d) from Rules R.P19 and WH.R20. Remove rules P.R21 and WH.R22.</p>			
S195.051	<p>Chapter 12 Schedules</p> <p>Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.</p> <p>In Objective B (2) it is noted the term 'natural state' is undefined. Considers if this objective is to apply to forest land it should equally apply to other land uses.</p> <p>Considers the identification and classification of 'highest erosion risk' land relied on in Objective B (4) is unsuitable.</p> <p>Remove objectives B (2) and B (4) from Schedule 34.</p>	Support	In addition to the relief sought in NZCF's primary submission, NZCF generally agrees with the submission for the reasons given.	<b>Allow</b> the submission.
<b>S280 Peter Handford (submission number S280)</b>				
S280.001	<p>General comments</p> <p>Considers focus of PC1 should be achieving environmental outcomes, not prescriptive blanket removal of land uses from particular areas.</p>	Support	NZCF supports the submission and considers that the effects of activities should be managed, rather than the activities prevented.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S280.002	General comments General comments - plantation forestry Considers forestry management can be applied where this a strong focus on environmental outcomes such as soil and water protection and biodiversity	Support	NZCF supports the submission and agrees that Proposed Plan Change 1 fails to consider management practices and the outcomes achieved by the NESCF.	<b>Allow</b> the submission.
S280.003	General comments General comments - plantation forestry Concerns PC1 creates blanket exclusion for forestry rather than set out measurable outcomes across all land uses with identified monitoring approaches	Support	NZCF supports the submission and considers that the effects of activities should be managed, rather than the activities prevented.	<b>Allow</b> the submission.
S280.004	General comments General comments - plantation forestry Concerns PC1 creates a blanket exclusion for "highest erosion risk areas without recognising range of forest management options. Considers this removes potential for forest management to of provide ecosystem services including biodiversity, carbon sequestration, soil and water protection and recreation. Considers Innovative and environmentally sensitive forest management approaches should be facilitated and encouraged as low impact forestry management is possible without negative impacts.	Support	NZCF supports the submission and considers that the effects of activities should be managed, rather than the activities prevented.	<b>Allow</b> the submission.
<b>Peter Kiernan (submission number S054)</b>				
S54.002	General comments General comments - economic cost/impact Concerned the decisions of the proposed plan change could be rolled out on the Kapiti Coast - where the submitter resides. Concerned the extra costs associated with consultant and resource consent fees will make forestry uneconomical. Believes that rules governing forestry in PC1 would render interest in land incapable of reasonable use citing section 85 of the RMA. Ensure that if national standards are followed forestry harvesting be a Permitted Activity under the plan.	Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S54.003	Chapter 8 Whaitua Te Whangan ui-a-Tara Rule WH.R20: Plantation forestry - controlled activity. Considers that without local scientific data that changes to the forestry rules are not justified.	Support	NZCF supports the submission and agrees that the section 32 evaluation fails to provide sufficient evidence and rationale to confirm that the Rule is necessary and appropriate.	<b>Allow</b> the submission.
S54.004	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry - discretionary activity. Considers that without local scientific data that changes to the forestry rules are not justified.	Support	NZCF supports the submission and agrees that the section 32 evaluation fails to provide sufficient evidence and rationale to confirm that the Rule is necessary and appropriate.	<b>Allow</b> the submission.
S54.005	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity. Considers that without local scientific data that changes to the forestry rules are not justified.	Support	NZCF supports the submission and agrees that the section 32 evaluation fails to provide sufficient evidence and rationale to confirm that the Rule is necessary and appropriate.	<b>Allow</b> the submission.
S54.006	General comments General comments –plantation forestry Considers that without local scientific data that changes to the forestry rules are not justified.	Support	NZCF supports the submission and agrees that the section 32 evaluation fails to provide sufficient evidence and rationale to confirm that the Rule is necessary and appropriate.	<b>Allow</b> the submission.
<b>PF Olsen Ltd (submission number S018)</b>				
S18.002	Chapter 2 Interpretation Earthworks Concerned with having different definitions for earthworks and seeks consistency within legislation. Seeks clarification on if earthworks rules apply for forestry earthworks outside of Rules WR.20, WR.21, WH.R22, P.R19, P.R20 and P.R21. Amend the definition of Earthworks to provide consistency. Exclude forestry earthworks from earthworks rules.	Support	NZCF supports the submission to the extent that NZCF considers that the definition should be clear in its meaning and application including in respect of the rules that apply to commercial forestry.	<b>Allow</b> the submission.
S18.004	Chapter 2 Interpretation Highest erosion risk land (plantation forestry) Considers that there is more research available to determine landslide by susceptibility, citing recent New Zealand research.	Support	NZCF supports the submission and acknowledges that there is more research available to support the definition. However, NZCF supports the definition being aligned with the definition in the NESPF or subsequent NESCF.	<b>Allow</b> the submission, subject to the relief sought in NZCF's primary submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Delete the mapping layer or have it peer reviewed to establish its scientific validity.			
S18.028	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.</p> <p>Considers the prohibition of forestry activities in high erosion areas is too restrictive, resulting in economic burden and triggering liabilities under the ETS. Seeks greater alignment with the NES-CF and a more scientific approach in formulating forestry regulations. Seeks for the consideration of positive effects of well-managed forests on water quality and biodiversity. Considers there is preferential leniency towards farming practices over forestry activities which contradicts scientific evidence and obstructs the growth of both sectors. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Seeks a more detailed analysis of the economic impact of the proposed retirement rules on the forestry sector. Notes section 85(1) of the Resource Management Act (RMA) prohibits provisions that deem land unusable or injuriously affected without justification.</p> <p>Delete policy.</p>	Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission.	<b>Allow</b> the submission.
S18.034	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity</p> <p>Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o- Porirua Whaitua Implementation Programme and is concerned about the coherence and appropriateness of the proposed forestry regulations. Considers that the assessment methodology for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities.</p>	Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding.</p> <p>Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.</p> <p>Amend to recognise permitted activity status from the NES- CF.</p>			
S18.035	<p>Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry - discretionary activity."</p> <p>Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o- Porirua Whaitua Implementation Programme and is concerned about the coherence and appropriateness of the proposed forestry regulations. Considers that the assessment methodology for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities.</p> <p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding.</p> <p>Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.</p>	Support	<p>NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated</p>	<p><b>Allow</b> the submission.</p>



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Amend activity status to controlled, with criteria that can be met by landowners.			
S18.036	<p>Chapter 8 Whaitua Te Whangan ui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o- Porirua Whaitua Implementation Programme and is concerned about the coherence and appropriateness of the proposed forestry regulations. Considers that the assessment methodology for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities.</p> <p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding.</p> <p>Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests.</p> <p>Delete the provision.</p>	Support	NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated	<b>Allow</b> the submission.
S18.054	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.</p> <p>Considers the prohibition of forestry activities in high erosion areas is too restrictive, resulting in economic burden and triggering liabilities under the ETS. Seeks greater alignment with the NES-CF and a more scientific approach in formulating forestry regulations. Seeks for the</p>	Support	NZCF supports the submission for the reasons given and the reasons set out in NZCF's primary submission.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>consideration of positive effects of well-managed forests on water quality and biodiversity. Considers there is preferential leniency towards farming practices over forestry activities which contradicts scientific evidence and obstructs the growth of both sectors. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Considers retirement rules for forestry need a scientific foundation and the effects of forestry on sedimentation be reevaluated. Seeks a more detailed analysis of the economic impact of the proposed retirement rules on the forestry sector. Notes section 85(1) of the Resource Management Act (RMA) prohibits provisions that deem land unusable or injuriously affected without justification.</p> <p>Delete the policy</p>			
S18.061	<p>Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R19: Plantation forestry - controlled activity</p> <p>Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o- Porirua Whaitua Implementation Programme.</p> <p>Considers that the assessment methodology undertaken for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities.</p> <p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding.</p> <p>Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-</p>	Support	<p>NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated</p>	<p><b>Allow</b> the submission.</p>

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>managed forests.</p> <p>Amend to recognise permitted activity status from the NES- CF.</p>			
S18.062	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R20: Plantation forestry - discretionary activity."</p> <p>Concerned the activity status for forestry activities for Whaitua Te Whanganui-a-Tara bypasses the NES-CF. Concerned that PC1 rules do not align with the recommendations of the Te Awarua-o- Porirua Whaitua Implementation Programme.</p> <p>Considers that the assessment methodology undertaken for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer-review, and flawed evaluation of retirement, space planting, and riparian management rules based on farming activities.</p> <p>Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not.</p> <p>Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well- managed forests</p> <p>Amend activity status to restricted discretionary, with criteria that can be met by landowners.</p>	Support	<p>NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated</p>	<b>Allow</b> the submission.
S18.063	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.</p> <p>Concerned PC1 rules do not align with the recommendations of the Te Awarua-o-Porirua Whaitua Implementation Programme. Considers that the assessment methodology undertaken for the s32 report (Greer, 2023a and 2023b) is insufficient to demonstrate the effectiveness of the proposed forestry rules, due to the lack of a peer- review, and flawed evaluation of retirement, space planting, and riparian management</p>	Support	<p>NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated</p>	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	rules based on farming activities. Concerned that there is a presumption that forestry activities are a significant cause of sedimentation, citing studies which suggest that they do not. Considers that pastoral systems are treated preferentially to forestry and questions the scientific basis of the proposed regulations. Cites a study which highlights the positive impact of trees on water quality, and suggests that forests provide water storage during winter and release rainfall gradually, which mitigates downstream flooding. Seeks that the proposed rules, particularly those that restrict tree planting near water bodies, recognise the positive contributions of well-managed forests." Delete the provision			
S18.071	Chapter 12 Schedules Schedule 34: Plantation Forestry Erosion and Sediment Management Plan. Considers an erosion and sediment management plan is redundant for forestry activities, as these are already managed under the NES-CF. Delete this schedule. Refer to NES-CF management plans.	Support	NZCF supports the submission and considers that commercial forestry is best managed by the NESCF as a higher order planning instrument.	<b>Allow</b> the submission.
S18.077	Chapter 13 Maps Map 95: Highest erosion risk land (Plantation forestry) - Te Whanganui-a-Tara. Considers there is more research available to determine landslide by susceptibility, citing recent New Zealand research. Delete the mapping layer or have it peer reviewed to establish its scientific validity.	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.	<b>Allow</b> the submission.
<b>Southern North Island Wood Council (submission number S262)</b>				
S262.002	General Comments General comments - overall Considers that PC1 is inconsistent with the whitua committee recommendations and is too onerous.	Support	NZCF supports the submission and agrees that Proposed Plan Change 1 is inconsistent with the whitua committee recommendations. NZCF considers that greater weight should be given to these recommendations in Proposed Plan Change 1.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S262.003	General comments General comments - plantation forestry Considers there has been no consideration for ETS implication with the removal of land from production.	Support	Consistent with NZCF's primary submission, NZCF supports the submission and considers that no consideration has been given to the ETS in Proposed Plan Change 1 and the accompanying section 32 evaluation.	<b>Allow</b> the submission.
S262.004	General comments General comments – maps Considers there are impracticalities of the current erosion mapping class system. Considers the resolution too low and does not reflect forest scale erosion risk.	Support	NZCF supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic, geological and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.	<b>Allow</b> the submission.
S262.010	General comments General comments -plantation forestry Notes the NES-CF was altered to include permanent carbon forestry to fix a loop hole related to resource consents and notifications. Considers PC1 will severely impact forest owners in the region with ETS registered forests. Notes one member of the submitter's organisation will lose between 4% and 18% of productive area by forest, which equates to 330ha. The ETS Liability on this area at current prices is approximately \$18 million NZD.	Support	Consistent with NZCF's primary submission, NZCF supports the submission and considers that no consideration has been given to the ETS in Proposed Plan Change 1 and the accompanying section 32 evaluation.	<b>Allow</b> the submission.
S262.011	General comments General comments - plantation forestry Considers there is insufficient evidence to suggest that: - there is an issue with sediment produced from plantation forestry; - the NES-CF has led to more adverse environmental outcomes compared to the pre-2018 consenting regime; - that either forestry or the NES-CF are attributed to current water quality issues. Disagrees with the s32 evaluation of the social costs for Options 1 and 3 being minimal, due to job losses in plantation forestry operations, at the port, and regional sawmills. Considers that the NES-CF is sufficient to manage sediment from forestry activities.	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S262.012	<p>General comments</p> <p>General comments-plantation forestry</p> <p>Considers the analysis of monetary implications in the s32 report is insufficient as it is feasible to estimate costs of resource consent applications, consent processing and monitoring, devaluation of forestry land, a decline in economic activity and forfeiture of income from timber and carbon credits. Considers s32 should explicitly acknowledge high and medium economic costs for Option 1 and Option 3, respectively.</p> <p>Notes further economic considerations, being devaluation of forest land; decline in economic activity; and loss of income from timber and carbon credits. Considers the economic costs for Option 1 (as evaluated in the s32 report) will be substantial, and moderate for Option 3, both resulting in an overall "negative benefit".</p>	Support	NZCF supports the submission and considers that the section 32 evaluation has failed to appropriately consider the economic costs of the Proposed Plan Change 1 provisions that relate to forestry.	<b>Allow</b> the submission.
S262.015	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20:</p> <p>Plantation forestry - controlled activity.</p> <p>Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.</p> <p>"Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF.</p> <p>Object to any other substitution of rules in the NES-PF with new rules in the plan.</p> <p>Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.</p> <p>Seek that replanting will not to be regulated in the plan."</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S262.016	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p>	Support	NZCF supports the submission for the reasons included in the submission and in	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.</p> <p>Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF.</p> <p>Object to any other substitution of rules in the NES-PF with new rules in the plan.</p> <p>Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.</p> <p>Seek that replanting will not to be regulated in the plan.</p>		NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	
S262.017	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity</p> <p>Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.</p> <p>Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF.</p> <p>Object to any other substitution of rules in the NES-PF with new rules in the plan.</p> <p>Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.</p> <p>Seek that replanting will not to be regulated in the plan.</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S262.020	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R19: Plantation forestry - controlled activity</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1</p> <p>Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF.</p> <p>Object to any other substitution of rules in the NES-PF with new rules in the plan.</p> <p>Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.</p> <p>Seek that replanting will not to be regulated in the plan.</p>		that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	
S262.021	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R20: Plantation forestry - discretionary activity.</p> <p>Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.</p> <p>Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF.</p> <p>Object to any other substitution of rules in the NES-PF with new rules in the plan.</p> <p>Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.</p> <p>Seek that replanting will not to be regulated in the plan.</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S262.022	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.</p>	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be	<b>Allow</b> the submission.



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the rules of PC1 should not override the NES-CF. Seeks that Rules P.R19, P.R20, P.R21, WH.R20, WH.R21 and WH.R22 are deleted, including associated notes which state that rules prevail over the NES-PF. Objects to any other rules which would substitute those of the NES-PF. Objects to the inclusion of forestry activities in Policies WH.P2, P.P2, WH.P28 and P.P26. Seeks that replanting is not regulated in PC1.</p> <p>Remove proposed forestry related changes, i.e. P.R19, P.R20 and P.R21, as well as Rules WH.R20, WH.R21 and WH.R22 and also the detailed notes that these new rules prevail over certain rules in the NES-PF.</p> <p>Object to any other substitution of rules in the NES-PF with new rules in the plan.</p> <p>Remove policies WH.P2 , P.P2, WH.P28 and policy P.P26 as far as they relate to forestry.</p> <p>Seek that replanting will not to be regulated in the plan.</p>		<p>withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.</p>	
<b>S225 Upper Hutt City Council (submission number S225)</b>				
S225.090	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>"Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry. Considers policy appears to conflict with requirements of NES-CF. Delete policy.</p>	Support	<p>NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.</p>	<b>Allow</b> the submission.
S225.105	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry – controlled activity Considers this does not appear to align with requirements of NESCF. Delete rule.</p>	Support	<p>NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.</p>	<b>Allow</b> the submission.
S225.106	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity. Considers this does not appear to align with requirements of NESCF. Delete rule.</p>	Support	<p>NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the</p>	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			effectiveness of the NESCF has been appropriately evaluated.	
<b>Wairarapa Federated Farmers (submission number S193)</b>				
S193.012	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers Policy WH.P28 and Rule WH.R22 (requiring plantation forestry is not established or continued beyond the harvest of existing plantation forests on highest erosion risk land) to be a draconian approach that ignores technological advances forestry harvesters have made to harvest practices.</p> <p>Considers the policy an example of managed retreat' for the public good, with all the cost borne by the landowner. Identifies there will be challenges sourcing sufficient seed stock for planting, finding labour to plant native seed stock and sourcing, and paying for specialist advice to ensure new plantings occur in a way that is consistent with the Emissions Trading Scheme (ETS) eligibility criteria to avoid plantings being ineligible for New Zealand Units (NZUs).</p> <p>Considers the conversion of exotic forest to permanent forest presents several difficulties about the ETS as outlined below:</p> <p>Uncertainty around how the ETS treats the transition of registered exotic forests to native forest species,</p> <p>Uncertainty around how averaging accounting would address a new planting rotation occurring on a very different basis to when the forested area was originally registered in the ETS</p> <p>Uncertainty around the sequestration rates of native species (this work is still in its infancy and may need 5-6 more years to produce anything of any use)</p> <p>Uncertainty around the possibility of needing to first de-register the exotic forest (and paying back all the NZUs earned from it) before registering the native forest as a new forest.</p> <p>Request this policy be amended to enable the replanting of production forests so long as landowners can identify (through a consent application) how the management and harvest of the forest will be achieved without adverse effects on sediment in water bodies.</p>	Support	Subject to NZCF's primary submission, NZCF supports the submission and similarly considers that replanting should be permitted subject to appropriate management measures to avoid or mitigate adverse effects. NZCF considers that this can be achieved under the NESCF.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Amend policy to enable the replanting of production forests so long as landowners can identify (through a consent application) how the management and harvest of the forest will be achieved without adverse effects on sediment in water bodies. Make any consequential amendment(s) necessary to give effect to the relief sought.			
S193.088	Chapter 8 Whaitua Te Whanganui-a-Tara Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry Considers this is addressed by existing national and regional regulation. Delete P28 Make any consequential amendment(s) necessary to give effect to the relief sought.	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S193.097	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R20: Plantation forestry - controlled activity Retain operative NRP rule Delete R20 Make any consequential amendment(s) necessary to give effect to the relief sought.	Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission to the extent that the Rule is deleted.
S193.098	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R21: Plantation forestry - discretionary activity. Retain operative NRP rule Delete R21 Make any consequential amendment(s) necessary to give effect to the relief sought.	Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1	<b>Allow</b> the submission to the extent that the Rule is deleted.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	
S193.099	Chapter 8 Whaitua Te Whanganui-a-Tara Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity. Retain operative NRP rule Delete R22 Make any consequential amendment(s) necessary to give effect to the relief sought.	Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission to the extent that the Rule is deleted.
S193.137	Chapter 9 Te Awarua- o-Porirua Whaitua Policy P.P26: Achieving reductions in sediment discharges from plantation forestry. Considers this is addressed by existing national and regional regulation Delete P26 Make any consequential amendment(s) necessary to give effect to the relief sought.	Support	NZCF supports the submission for the reasons included in the submission and in NZCF's primary submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.
S193.146	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R19: Plantation forestry – controlled activity Retain operative NRP rule Delete Make any consequential amendment(s) necessary to give effect to the relief sought.	Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission to the extent that the Rule is deleted.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S193.147	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R20: Plantation forestry - discretionary activity." Retain operative NRP rule. Delete Make any consequential amendment(s) necessary to give effect to the relief sought.	Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission to the extent that the Rule is deleted.
S193.148	Chapter 9 Te Awarua- o-Porirua Whaitua Rule P.R21: Plantation Forestry on highest erosion risk land prohibited activity. Retain operative NRP rule Delete Make any consequential amendment(s) necessary to give effect to the relief sought.	Support in part	NZCF generally supports the submission but considers that the retention of rules to manage plantation forestry could give rise to inappropriate duplication with the regulations in the NESCF. NZCF considers that the NESCF appropriately manages commercial forestry and additional or more stringent provisions are not necessary. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission to the extent that the Rule is deleted.
S193.197	Chapter 13 Maps Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua. Considers the methodology is not fit for purpose Delete Make any consequential amendment(s) necessary to give effect to the relief sought.	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.	<b>Allow</b> the submission.
S193.200	Chapter 13 Maps Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the methodology is not fit for purpose</p> <p>Delete</p> <p>Make any consequential amendment(s) necessary to give effect to the relief sought.</p>		<p>responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.</p>	
<b>Wellington Branch of New Zealand Farm Forestry Association (submission number S036)</b>				
S36.005	<p>General comments</p> <p>General comments- overall</p> <p>Notes the proposed approach to prohibit production forestry from 10% of the steepest forestry land is based on catchment modelling, on the assumption that the steepest land delivers the most sediment to waterways via landslides. Concerned this approach is not based on objective evidence, does not consider other sources of sediment, and the approach is inconsistent with forestry best practice guidelines and scientific literature on forestry erosion.</p>	Support	<p>NZCF generally supports the submission for the reasons given and similarly considers that the provisions of Proposed Plan Change 1 should be supported by sound rationale and evidence.</p>	<b>Allow</b> the submission.
S36.010	<p>General comments</p> <p>General comments - current legislation</p> <p>Considers GW should allow the new NES-CF to bed in and actively monitor compliance and land performance (commission research) and withdraw the prohibition on harvest in the meantime. Failing this, the submitter considers GW should exempt forestry under 20ha as a Controlled Activity.</p> <p>Withdraw the prohibition on harvest.</p> <p>Should the above relief not be granted, exempt forestry under 20ha as a controlled activity.</p>	Support	<p>NZCF generally supports the submission and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.</p>	<b>Allow</b> the submission.
S36.011	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers GWRC should ask for ESC data used by NESCF to be reviewed and make a technical case if Wellington, Hutt Valley and Porirua have an erosion risk severe enough to warrant banning plantation forestry (red zoned land). Notes national consistency on this matter is desirable.</p>	Support	<p>NZCF supports the concept of sourcing the data that supported the development of the NESCF in order to 'test' the appropriateness of Proposed Plan Change 1 as it relates to forestry activities.</p>	<b>Allow</b> the submission.
S36.012	<p>General comments</p> <p>General comments – overall</p>	Support	<p>NZCF supports the relief sought and considers that a full range of alternatives</p>	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Concerned PC1 lacks input from experienced soil conservators and questions why they were not consulted. Considers a tunnel-view solution is proposed for a problem that may not exist.</p> <p>Rather than prohibit Plantation Forestry from the steepest slopes, explore other ways of mitigating the risk of erosion from steep slopes after harvesting.</p>		should be considered as part of an appropriately detailed evaluation under section 32 of the RMA.	
S36.013	<p>General comments</p> <p>General comments - current legislation</p> <p>Considers the regulations in the NES-CF are sufficient to minimise negative environmental effects of plantation forestry on water bodies, noting the NES-CF has sound scientific backing. Considers conditions that are more stringent than the NES-CF should be based on compelling evidence about the scale of the problem, including the source of pollutants and that current rules are not working.</p>	Support	NZCF shares the view that the appropriateness and necessity of additional regulation, beyond the Regulations in the NESCF should be rigorously tests against sound evidence as part of an appropriately detailed evaluation under section 32 of the RMA.	<b>Allow</b> the submission.
S36.017	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Notes there are no studies that measure the amount of sediment from forestry operations in the Whaitua Te Whanganui-Tara or Te Awarua-o-Porirua Whaitua. Modelling that has occurred is based on broad assumptions. Considers Wellington forests have minimal erosion problems and therefore have not been closely studied, and science work has been focused on highly erosion prone land in other areas, which are subject to orange and red zoning under the NES-CF. Notes no such land classes are present in the Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua. Notes GW have not sought professional forestry or soil conservator advice. Considers some policies are based on models of erosion risk rather than real data.</p> <p>Considers it is not possible to allocate equitable contributions to reducing sediment loads without data on the relative contributions of sediment from natural sources, forestry, pastoral farming and urban/roading development.</p>	Support	NZCF generally supports the submission for the reasons given and similarly considers that the provisions of Proposed Plan Change 1 should be supported by sound rationale and evidence.	<b>Allow</b> the submission.
S36.020	<p>General comments</p> <p>General comments – maps</p>	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Concerned the maps (based on mapping by Easton) identifying the highest risk erodible land for pastoral, woody vegetation and plantation forestry land are based on an assumption that bare land after clear-felling will have a risk of erosion similar to pasture and there is a significant window of vulnerability after harvest. Considers this risk is overstated as roots and minor debris armour the slope for a period and there are ways of mitigation erosion risk after harvest. Notes forestry land is only in a more vulnerable state (after harvest) about 10% of the time and should be regarded as if it was permanent woody vegetation, not pasture or bare soil.</p> <p>Considers the mapped erosion risk is relative rather than absolute, and does not account for underlying geology/lithology, roadworks, soil disturbance and forestry related activities as a potential source of sediment. Notes the mapping uses a 5m resolution, which is higher than the NES-CF and much of the highest risk erosion prone areas identified by Easton are so large that, had they qualified as Red Zone, the NES-CF/ESC resolution would have picked them up.</p> <p>Notes the C factor identified for the maps, and disagrees that pasture is only twice as susceptible to erosion as woody vegetation and that otherwise undisturbed bare earth (with or without roots) should not be 10 times worse than pasture. Considers the Risk of Erosion model is not nearly as sophisticated as that used to calculate Erosion Susceptibility Classes (ESC) for the NES-CF.</p> <p>References earlier mapping (2012) that considered the risk of pastureland slipping into water bodies. References Stats NZ Highly Erodible Land maps. Notes several researchers who state that shallow landslides often do not reach waterbodies and most of the material is retained on site as talus, particularly on sites with woody vegetation.</p> <p>Considers the mapping contracted to Easton et al did not consider the risk of sediment actually getting into waterbodies.</p> <p>Concerned the identified land parcels do not take into account the underlying lithology and Land Use Class Categories as is done for Erosion Susceptibility Classification used by NES-CF, which is intended to reflect an absolute risk of erosion.</p>		<p>responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 are replaced with the erosion susceptibility classification in the NESPF.</p>	



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Considers the approach used by Easton et al, and data produced should be subjected to expert technical review.</p> <p>Commission a technical review of the mapping by Easton et al.</p>			
S36.025	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers it unreasonable to set worst case stormwater sediment discharges for forestry cycles as if they operate at the same frequency each year, or with every rain event. Considers it more equitable to time-average discharge limits for forestry over a 25-35 year period. Considers insufficient understanding is demonstrated in PC1 of sediment loss to waterways within a cyclic forestry environment. Considers the peak point source sediment limits of 100g/m<sup>3</sup> is unrealistic. Considers it better to define forestry best practice and audit to those standards.</p> <p>The submitter has not observed evidence that steep slopes are producing significant areas of shallow landslides (Upper Hutt area). Suggests Greater Wellington produce evidence from their own forests (rather than rely on dubious modelling).</p>	Support	NZCF supports the submission for the reasons given.	<b>Allow</b> the submission.
S36.026	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Notes data is needed to determine where sediment is coming from. However, considers forestry earthworks, including roading and associated batters, culverts, stream crossings, use of skidders, for plantation forestry near Upper Hutt are much more frequent and significant sources of sediment than shallow land slide and surficial erosion from steep slopes after tree harvest. States this view is supported by the Hawkes Bay Pakuratahi Paired catchment report, (Eyles). Notes Natural State sediment contributions can be significant.</p> <p>Considers forestry roadworks and associated harvesting earthworks can generally be managed to minimise but not eliminate sediment loss to waterways, but rather than focus on extremely conservative peak discharge limits, the sediment losses over the whole forestry cycle need to be factored in.</p>	Support	NZCF supports the submission for the reasons given and considers that commercial forestry activities are appropriately managed by the NESCF regulations.	<b>Allow</b> the submission.
S36.028	<p>General comments</p> <p>General comments plantation forestry</p>	Support	NZCF supports the submission for the reasons given.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Considers the performance requirements for woody vegetation replacing pastoral land is a low expectation compared to performance of exotic timber species in managed plantations, and does not meet ETS performance standard for pre-1990 forestry succession. Considers there is potential to improve carbon sequestration by encouraging managed exotic forestry species. Suggests rather than banning production forestry from steepest slopes, consider alternative timber species, permanent forestry, carbon forestry continuous cover forestry / close to nature forestry to reduce risk of sediment loss.			
S36.030	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers there are many alternative solutions to mitigate the risk of sediment loss from steep slopes and the production forestry ban will undermine research into improved technologies for harvesting and silviculture on steep slopes. Cites the following examples of alternatives:</p> <ul style="list-style-type: none"> <li>- Panpac's method of re-grassing or sowing a cover crop immediately after harvest which greatly reduces surficial runoff and would enable use of selective herbicides to reduce woody regrowth (pines/gorse etc) later and prior to replanting in crop trees.</li> <li>- immediate replanting of crop trees in some situations</li> <li>- replanting at higher than usual planting density</li> <li>- lower final stocking rates</li> <li>- impose restrictions on tracking/earthworks on steepest slopes (and/or additional safeguards to prevent sediment moving offsite.</li> <li>- use of coppicing timber crop species such as poplars, acacia, oak, redwoods and eucalypts.</li> <li>- extend rotation length</li> <li>- alternative harvesting strategies e.g. small coup, strip harvest, selection harvesting.</li> <li>- close to nature (Pro Silva) or Continuous Cover Canopy regimes.</li> </ul> <p>Suggests the definition of highest risk erodible forest land can be adjusted by increasing the slope angle to above 30 degrees and taking into account underlying lithology. Considers the criteria used should be</p>	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>technically peer reviewed by industry recognised experts and aligned to observed field data. Prefers the provisions of the NES-CF prevail.</p> <p>Amend the definition of 'highest risk erodible forest land' by increasing the slope angle to above 30 degrees and taking into account underlying lithology.</p> <p>That the criteria used are technically peer reviewed by industry recognised experts and aligned to observed field data.</p>			
S36.032	<p>General comments</p> <p>General comments - plantation forestry</p> <p>Considers the s32 report cost/benefit assessment lacks logic and underestimates financial impacts. Considers the greater than 10% of land taken out of production forestry will have long-term impact, undermine confidence in plantation forestry, and will reduce the benefits of plantation forestry. Notes the desire for equitable processes to achieve the TAS and this should not be about everyone adjusting by an equal amount but about quantifying the problem and minimising environmental risk by targeting the highest contributors of sediment. Questions the equitability of the TAS, noting forestry is a controlled activity but not pastoral farming when the literature indicates pastoral farming activities are far more likely than forestry to release sediment and other contaminants into waterbodies.</p>	Support	NZCF supports the submission for the reasons given and similarly considers that the section 32 evaluation does not demonstrate the appropriateness or necessity for the forestry related provisions in Proposed Plan Change 1.	<b>Allow</b> the submission.
S36.033	<p>General comments</p> <p>General comments plantation forestry</p> <p>Considers the majority of published evidence shows plantation forestry is much better than pastoral farming in highly erodible zones in relation to soil disturbance and sediment runoff.</p> <p>Notes some sensitive harbours and estuaries are silting up but we don't know the relative contributions from Wellington area forestry vs natural or other land activities.</p> <p>Considers the case put forward by GW is weak, based on a false premise that steepest forestry land will deliver most of the sediment and some of the evidence (visual clarity and sediment yields) is factually incorrect.</p> <p>Notes the NES-CF has been revised with tighter controls and has only just been implemented.</p>	Support	NZCF supports the submission for the reasons given and considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Concerned there are serious errors in the assigned TAS values. Considers the gravity of the situation does not warrant overriding the NES-CF and it is unknown whether the original NES-PF had any effect. Notes available data suggests deposited fine sediment in some forestry catchments has improved since 2013-2015. Concerned the rules are being tightened instead of undertaking enforcement.			
S36.040	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.</p> <p>Considers policy is misguided, noting Wellington, Hutt Valley and Porirua hills are greywacke, with low risk of shallow landslide. Considers no evidence is provided which suggests steepest slopes are a significant source of sediment after forest harvest.</p> <p>Considers earthworks before and during harvest are a more likely source of sediment. Considers withdrawing plantation forestry from steepest slopes could have unintended consequences and increase risk of sediment loss. Notes alternative ways to mitigate risk of sediment loss from steep land.</p>	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission for the reasons given. NZCF considers that there are methods available to manage adverse effects and that this should be reflected in the Policy.	<b>Allow</b> the submission.
S36.043	<p>Chapter 8 Whaitua Te Whangan ui-a-Tara</p> <p>Rule WH.R20: Plantation forestry - controlled activity</p> <p>Regarding clause (a), questions why high erosion risk pasture does not go straight into plantation forestry, noting that only highest risk slopes were proposed to prohibit plantation forestry.</p> <p>Regarding clause (b), considers it costly to prepare an erosion and sediment control plan, even if no steep erosion prone land is involved or proximity to water bodies.</p> <p>Regarding clause (c), considers the discharge limit of 100g/m<sup>3</sup> is impractical for forestry, particularly if landslides are involved. Considers it unreasonable to expect recently cleared slopes to produce no more sediment in water than that emerging from an intact canopy catchment upstream, even with sophisticated sediment controls.</p> <p>Regarding clause (d), considers visual clarity an invalid surrogate measure for suspended solids, noting visual clarity can be affected by peat colour. Seeks the TAS is reviewed and reset to allow for a natural</p>	Support	Subject to the relief sought in NZCF's primary submission, NZCF supports the submission. NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated.	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>brown water input. Considers it unreasonable to penalise based on visual clarity test results outside of a forestry operator's control.</p> <p>Considers it unclear the effect of escalating plantation forestry to a discretionary activity.</p> <p>Regarding matter of control (1), notes forest activities with potential to release sediment are not the same every year, and that whole catchments are likely to be harvested concurrently.</p> <p>Regarding matter of control (2), concerned GW officials will determine area, location and methods used. Concerned the clause may prohibit forestry from otherwise suitable land and create health and safety concerns. Concerned GW officials may override appropriate contractor operations.</p> <p>Clause (a): Delete 'high erosion risk pasture'</p> <p>Amend clause (b) to exclude forests less than 20ha and not in red zoned land.</p> <p>Delete clause (c) and use best practise guidelines to control sediment.</p> <p>Delete clause (d).</p> <p>Amend matter of control (1):</p> <p>Do not increase average sediment load between forest lifecycles.</p> <p>Delete matter of control (2).</p>			
S36.045	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R22:</p> <p>Plantation forestry on highest erosion risk land - prohibited activity</p> <p>Considers the clause is too far reaching and is misguided. Concerned the clause assumes that surficial erosion and shallow landslide from the most erosion prone slopes after harvest are the major cause of sediment loss into water bodies, with no evidence to support this. Notes "afforestation" is different from "replanting". Prefers the NES-CF prevails. Suggests a number of other methods to mitigate the risk of sediment loss to water bodies in original submission. Considers a working threshold relating to use of highest risk erosion prone land is required as the grid resolution is only 5m (=25m<sup>2</sup>) which is not a practical unit for management.</p>	Support	<p>Subject to the relief sought in NZCF's primary submission, NZCF supports the submission.</p> <p>NZCF considers that Proposed Plan Change 1 should be withdrawn until such time as the effectiveness of the NESCF has been appropriately evaluated. NZCF considers there is no justification for such a stringent rule to prevail over the NESCF.</p>	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>That the NES-CF provisions prevail.</p> <p>Failing that:</p> <ul style="list-style-type: none"> <li>- remove the word ""afforestation"" until more research data is available.</li> <li>- Change the clause title to not indicate that plantation forestry is prohibited.</li> <li>- Review policy and engage with forest industry and forest experts.</li> <li>- Land areas with contiguous 'pixels' need to be larger than 1000m<sup>2</sup> for the regulations to apply.</li> </ul>			
<b>Winstone Aggregates (submission number S206)</b>				
S206.018	<p>General comments</p> <p>General comments – maps</p> <p>Supports a nuanced approach to high erosion risk land, wherein the PC1 definitions differentiate between vegetation types. However, concerned with the accuracy and quality of the mapping referenced in the definitions.</p> <p>Review mapping, or remove and the current approach relied on until robust mapping is undertaken.</p>	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Maps 92 and 95 replaced with the erosion susceptibility classification in the NESPF.	<b>Allow</b> the submission.
S206.048	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P31: Winter shut down of earthworks.</p> <p>Considers the policy does not anticipate activities that require earthworks year-round such as quarrying. Considers shutting down winter earthworks within an active quarry will adversely impact regional aggregate supply and the ability to respond to a natural disaster. Considers insufficient justification is provided in the s32 evaluation for the shut down period. Disagrees with the assumption that increased sediment discharges are more likely during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Seeks removal of the policy and considers risk associated with unpredictable weather events can be managed through existing provisions.</p>	Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Delete Policy			
S206.076	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Policy P.P29: Winter shut down of earthworks.</p> <p>Considers the policy does not anticipate activities that require earthworks year-round such as quarrying. Considers shutting down winter earthworks within an active quarry will adversely impact regional aggregate supply and the ability to respond to a natural disaster. Considers insufficient justification is provided in the s32 evaluation for the shut down period. Disagrees with the assumption that increased sediment discharges are more likely during winter months, noting that unpredictable rainfall events can occur at any time of year, which will increase with climate change. Further notes that receiving environments are less vulnerable during winter months as water temperatures are lower and flows are higher. Seeks removal of the policy and considers risk associated with unpredictable weather events can be managed through existing provisions.</p> <p>Delete Policy</p>	Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	<b>Allow</b> the submission.
<b>Woodridge Holdings Ltd (submission number S255)</b>				
S255.031	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Policy WH.P31: Winter shut down of earthworks. Considers the policy is not effects based as not every earthworks project over 3,000m<sup>2</sup> will have negative adverse effects if works are underway between 1 June and 30 September. Considers each job should be treated on its merits and conditioned accordingly.</p> <p>Delete Policy</p>	Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	<b>Allow</b> the submission.
S255.051	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Policy P.P29: Winter shut down of earthworks.</p> <p>Considers the policy is not effects based as not every earthworks project over 3,000m<sup>2</sup> will have negative adverse effects if works are underway between 1 June and 30 September. Considers each job should be treated on its merits and conditioned accordingly.</p> <p>Delete Policy</p>	Support	NZCF supports the submission and considers that a pathway should be provided for earthworks during winter months consistent with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).	<b>Allow</b> the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
S255.118	<p>Chapter 13 Maps</p> <p>Map 92: Highest erosion risk land (Plantation forestry) - Te Awarua-o-Porirua.</p> <p>Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.</p> <p>Provide TA District Plan style online maps.</p>	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Map 92 is replaced with the erosion susceptibility classification in the NESPF.	<b>Allow</b> the submission.
S255.121	<p>Chapter 13 Maps</p> <p>Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.</p> <p>Considers maps are basic and do not allow you to zoom into to a large enough scale to see exactly where boundaries are relative to property boundaries.</p> <p>Provide TA District Plan style online maps.</p>	Support	NZCF generally supports the submission and similarly is concerned that the rationale for the mapping is not clearly set out or responsive to topographic and land ownership considerations. NZCF seeks that Map 95 is replaced with the erosion susceptibility classification in the NESPF.	<b>Allow</b> the submission.
<b>Yvonne Weeber (submission number S183)</b>				
S183.243	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R20: Plantation forestry – controlled activity</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p> <p>No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.</p>	Oppose	NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1.	<b>Disallow</b> the submission.
S183.244	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p> <p>Rule WH.R21: Plantation forestry - discretionary activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p> <p>No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.</p>	Oppose	NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1.	<b>Disallow</b> the submission.
S183.245	<p>Chapter 8 Whaitua Te Whanganui-a-Tara</p>	Oppose	NZCF does not support the submission because the Rule is intended to address the	<b>Disallow</b> the submission.



Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>Rule WH.R22: Plantation forestry on highest erosion risk land - prohibited activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p> <p>No decision sought but considers that more work on this rule is needed in relationship to recent slash and debris issues and flooding in storm events.</p>		<p>discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1. In addition, the Rule is for a prohibited activity in any case.</p>	
S183.325	<p>Chapter 9 Te Awarua-o-Porirua Whaitua</p> <p>Rule P.R19: Plantation forestry - controlled activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p>	Oppose	<p>NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1.</p>	<b>Disallow</b> the submission.
S183.326	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R20: Plantation forestry - discretionary activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p>	Oppose	<p>NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1.</p>	<b>Disallow</b> the submission.
S183.327	<p>Chapter 9 Te Awarua- o-Porirua Whaitua</p> <p>Rule P.R21: Plantation Forestry on highest erosion risk land - prohibited activity.</p> <p>Considers the rule requires amendment to address slash and debris causing flooding in storm events.</p>	Oppose	<p>NZCF does not support the submission because the Rule is intended to address the discharge of sediment, as opposed to natural hazards. Further, the management of slash is addressed by the NESCF Regulations and the submission does not identify any gap or issue that would need to be addressed by Proposed Plan Change 1. In addition, the Rule is for a prohibited activity in any case.</p>	<b>Disallow</b> the submission.



NGĀ HAPŪ O ŌTAKI  
HE WAKA EKE NOA

**To:** Greater Wellington Regional Council  
Environmental Policy  
PO Box 11646, Manners Street  
Wellington 6142

By email: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

**Submitter:** Ngā Hapū o Ōtāki

**Attention:** Hearings Advisor Environmental Policy

**Re:** Proposed Change 1 to (PC1) to the Natural Resources Plan for the Wellington Region

This is a further submission made on behalf of Ngā Hapū o Ōtāki (NHoŌ), concerning Proposed Change 1 to the Natural Resources Plan as notified by Greater Wellington Regional Council (GWRC) on 30 October 2023.

NHoŌ has an interest in the PC1 that is **greater than the general public's interest** and we also represent a relevant aspect of the public interest, as set out in the Introduction below.

NHoŌ could **not** gain an advantage in trade competition through this further submission.

NHoŌ **would like to be heard** in support of this further submission and will **consider presenting a joint case** with other submitters who have made a similar submission.

NHoŌ seeks that the submissions be allowed or disallowed as set out in Appendix A.

NHoŌ thank GWRC for the opportunity to provide our further submission to PC1, we look forward to continuing work together as partners under Te Tiriti o Waitangi (**Te Tiriti**).



Denise Hapeta  
Chairperson, Ngā Hapū o Ōtāki

**Dated:** 8 March 2024

**Electronic address for service:** [office@nhoo.nz](mailto:office@nhoo.nz) and [denise.hapeta@twor-otaki.ac.nz](mailto:denise.hapeta@twor-otaki.ac.nz)

## Introduction

Tākina te tokotoko ko Ōtāki e  
Mai i ngā Maunga whakahī ō Tararua  
E rere atu ki waho  
Ripo kau atu ana te Moana ō Raukawa  
Tū mai rā te Motu Rongonui ō Kāpiti e  
Kei te riu ō Ōtāki  
Ko te Iwi e, Ko Ngāti Raukawa e  
Ko Huia, Ko Kapu, Ko Pare, Ko Koroki, Maiōtāki e  
Ko Ngā Hapū o Ōtāki e

The mana whenua of Ōtāki are five hapū of Ngāti Raukawa ki te Tonga: Ngāti Koroki, Ngāti Kapu, Ngāti Pare, Ngāti Maiōtāki and Ngāti Huia ki Katihiku (collectively, **Ngā Hapū**). Ngā Hapū are mana whenua and kaitiaki stretching from Horowhenua in the north to Kukutauaki in the south. Ngā Hapū have mandated NHoŌ to represent them for a variety of purposes, including responding to PC1.

As kaitiaki, Ngā Hapū inherits the obligation to care for, protect, and restore natural resources and other taonga, including all that exist between Papatūānuku and Ranginui. This includes tangible elements such as freshwater, coastal and terrestrial ecosystems and indigenous biodiversity, and intangible elements such as wairua and mauri. This obligation of care exists to ensure the environment is protected for tūpuna, ngā tāngata, and mokopuna (past, present and future generations), and upholds our whakapapa relationship to one another, and to ngā atua Māori.

Te Tiriti guarantees the tino rangatiratanga of Ngā Hapū over our ancestral lands, waterways and all other taonga in our rohe. Te Tiriti also ensures the partnership between Greater Wellington Regional Council and Ngā Hapū.

We, therefore, represent a relevant aspect of the public interest and we also have an interest in the proposal that is greater than the general public has.

## General Matters

NHoŌ recognises the mana of the hapū and iwi of the Wellington rohe, and we support their tino rangatiratanga within their rohe. In principle, we support Te Rūnanga o Toa Rangatira's original submission points that seek to give effect to the recommendations of Te Awarua o Porirua and Te Whanganui a Tara Whaitua Implementation Plans in PC1, thus acknowledging our close and long-established relationship through our shared history and continued partnership through the Confederation of Ātiawa ki Whakarongotai, Ngāti Raukawa ki te Tonga, Ngāti Toa Rangatira (the **ĀRT Confederation**).

NHoŌ, together with Ngāti Toa and Ātiawa ki Whakarongotai and the Kāwanatanga House are continuing to progress Whaitua Kāpiti. At the conclusion of Whaitua Kāpiti a plan change will be publicly notified to give effect to our recommendations, at such a time there may be a need to review the proposed amendments suggested through PC1 to assess whether they will apply to Whaitua Kāpiti. We

respectfully request that decisions made regarding PC1 do not limit or preclude our future plan change to give effect to Whaitua Kāpiti.

A matter of particular interest to NHOŌ is the amendments to Schedules F2a, F2b, F2c and F4. We generally support the proposed amendments that update the status of indigenous species and include new indigenous species to sites. Through our Kaitiaki and their observations, as well as our research conducted, we have observed indigenous species at sites not currently included in these Schedules. As kaitiaki, we must ensure that taonga species are protected through mechanisms such as the regional plan. As Te Tiriti partners we look forward to working with Greater Wellington Regional Council to Schedule additional sites at the appropriate time.

Appendix A: Further submission of Ngā Hapū o Ōtaki – Allow / Disallow Submission Points

NHoŌ support or oppose the submission of:	Sub Point Number:	NRP Change 1 Provision:	Support or oppose:	The reasons for NHoŌ's support or opposition are:	NHoŌ seeks the following:
Rangitāne o Wairarapa	S85.001	5.4.8 Damming and diverting water – Rule R151A: Ongoing diversion of a river – permitted activity	Support	NHoŌ agree with Rangitāne o Wairarapa that Proposed Rule 151A is inappropriate as it removes the mechanism to review the consent conditions over a long term (i.e. beyond 10 years) and whether the diversion remains appropriate.	Allow the submission point and relief sought to delete the proposed rule.
Rangitāne o Wairarapa	S85.002	6.16 Freshwater Action Plan Programme- Method 36	Support	NHoŌ agrees with Rangitāne o Wairarapa that mana whenua may wish to take an active role (to the extent they wish) in monitoring the effectiveness of Freshwater Action Plans. Monitoring plan provisions is a critical part of the planning cycle to review how well the rule (or other provisions) contribute to achieving the policies and objectives of the regional plan. Given that Freshwater Action Plans will be created in partnership with mana whenua, there also needs to be provision for mana whenua active involvement in assessing their effectiveness, including the application of mātauranga Māori.	Allow the submission point and relief sought to include the words: “Wellington Regional Council <u>in partnership with mana whenua</u> will monitor the effectiveness of the Freshwater Action Plans...”
Rangitāne o Wairarapa	S85.003	5.4.4 Uses of beds of lakes and rivers – general condition (n)	Support	NHoŌ agrees with the proposed amendments as they improve clarity and provide certainty for the protection of named birds identified in Schedule F2a (birds-rivers) or Schedule F2b (birds-lakes) at all times, rather than only during critical periods.	Allow the submission point.
Rangitāne o Wairarapa	S85.004	Rule R128: New structures - permitted activity	Support	NHoŌ supports the proposed amendments that improve certainty by identifying which activities the rule applies to. This ensures that other	Allow the submission point and relief sought to amend the rule to include an additional mechanism to consult with mana whenua for

				<p>structures are not inadvertently captured by the rule and considered permitted activities.</p> <p>We agree with Rangitāne o Wairarapa that there is no protection for sites of significance to mana whenua that are not recorded (in a regional plan) are protected from new structures. We also agree that there are many reasons why mana whenua may choose not to include certain sites within a plan and our relationship with significant sites and the sites themselves should not be limited or adversely impacted as a result.</p>	<p>activities in the beds of lakes and rivers.</p>
Rangitāne o Wairarapa	S85.005	Rule R132: Minor sand and gravel extraction - permitted activity	Support	<p>NHoŌ agrees with Rangitāne o Wairarapa that the proposed amendment to remove reference to the bed of a lake improves the clarity and interpretation of the rule and ensures that those activities are more appropriately dealt with under Rule R145.</p> <p>We agree with Rangitāne o Wairarapa that there is no protection for sites of significance to mana whenua that are not recorded (in a regional plan) from new structures. We also agree that there are many reasons why mana whenua may choose not to include certain sites within a plan and our relationship with significant sites and the sites themselves should not be limited or adversely impacted as a result.</p> <p>We note that gravel extraction from a waterbody and other activities that disturb the bed of a waterbody can have a direct impact on our relationship with the water and sites in, on or near</p>	<p>Allow the submission point and relief sought to amend the rule to include an additional mechanism to consult with mana whenua for activities in the beds of lakes and rivers.</p>

				the waterbody by restricting access to the waterbody or site, reducing water quality, disrupting natural flows and damaging sites or values associated with cultural practices. This negatively impacts our ability to uphold our inherited obligation as kaitiaki to protect and care for te taiao.	
Rangitāne o Wairarapa	S85.006	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside of sites of significance - discretionary activity	Support	<p>NHoŌ agrees with Rangitāne o Wairarapa that the proposed amendments improve clarity and remove incorrect cross-references to Schedules in the Coastal and Marine Area (<b>CMA</b>).</p> <p>We agree that there is no protection for sites of significance to mana whenua that are not recorded (in a regional plan) from excavation, deposition, or disturbance associated with gravel extraction for flood protection purposes or erosion mitigation.</p> <p>We support Rangitāne o Wairarapa whakaaro that there are many reasons why mana whenua may choose not to include certain sites within a plan and our relationship with significant sites and the sites themselves should not be limited or adversely impacted as a result.</p> <p>We note that gravel extraction from a waterbody and other activities at certain times or from particular locations that disturb the bed of a waterbody can have a direct impact on our relationship with the water and sites in, on or near the waterbody by restricting access to the waterbody or site, reducing water quality, disrupting natural flows and damaging sites or</p>	Allow the submission point and relief sought to amend the rule to include an additional mechanism to consult with mana whenua for activities in the beds of lakes and rivers.

				values associated with cultural practices. This negatively impacts our ability to uphold our inherited obligation as kaitiaki to protect and care for te taiao.	
Ara Poutama Aotearoa, The Department of Corrections	S248.069	Schedule 29: Stormwater Impact Assessments	Oppose in part	<p>In principle NHoŌ supports Schedule 29 which requires Stormwater Impact Assessments.</p> <p>NHoŌ opposes in part the proposed amendments to clause 8, as suggested by Ara Poutama Aotearoa. In particular, we oppose, reference to engaging only “<u>where there is a direct discharge to Ngā Taonga Nui a Kiwa identified in Schedule B or Sites of Significance identified in Schedule C</u>”.</p> <p>There may be other sites that would be adversely impacted by the effects of stormwater that are not listed in the regional plan, and the proposed amendment by Ara Poutama Aotearoa remove the requirement to engage with mana whenua where the discharge does not directly impact Schedule B and C.</p> <p>Further, we oppose the proposed amendment “<u>information supplied by, or the outcomes of any consultation with the relevant iwi authorities for the catchment within which the discharge is located</u>”. The proposed amendment is unclear, the drafting could be interpreted that <b>any</b> previous consultation regarding a particular catchment removes the requirement for further engagement with mana whenua on any new activities that require a Stormwater Impact Assessment [emphasis added]. It would be inappropriate to assume, in all circumstances, that information</p>	Disallow in part by retaining clause 8.



				<p>previously provided by mana whenua removes the requirement for future engagement without explicit permission from mana whenua.</p> <p>We acknowledge that there needs to be a pragmatic approach to engagement with mana whenua that considers capacity and resourcing issues. However, the amendments proposed by Ara Poutama Aotearoa could negatively impact our values, our relationship with te taiao, and our tino rangatiratanga.</p>	
Enviro NZ Services Ltd (Enviro NZ)	S209.061	Schedule 29: Stormwater Impact Assessments	Oppose in part	<p>In principle, NHoŌ supports Schedule 29 which requires Stormwater Impact Assessments.</p> <p>We oppose the deletion of clause 8. We are yet to conclude Whaitua Kāpiti and therefore have not confirmed whether the detail of Freshwater Action Plans would forego the requirement for Stormwater Impact Assessments.</p>	Disallow in part by retaining clause 8.
Woodridge Holdings Ltd	S255.093	Schedule 29: Stormwater Impact Assessments	Oppose	<p>It is unclear how the requirement to engage with mana whenua regarding a Stormwater Impact Assessment is in conflict with Clause 6(1)(f) of Schedule 4 of the RMA. On the contrary, it could be considered that Clause 8 of Schedule 29 of the NRP Change 1 would give effect to Clause 6(1)(f).</p> <p>We do not support the deletion of the requirement to engage with mana whenua for the reasons set out in our response to Ara Poutama Aotearoa's submission point S248.069 above.</p>	Disallow the submission point.
Minister of Conservation	S245.077	Rule R1: Outdoor burning – permitted activity	Support	NHoŌ agrees that the proposed amendments increase the rule's efficacy in the CMA, and will provide greater protection for te taiao and people	Allow the submission point.

				from discharges to air from outdoor burning by ensuring that the same level of protection is applied to the CMA as on land/property.	
Minister of Conservation	S245.081- S245.104	Rules R7, R8, R9, R10, R11, R12, R14, R15, R16, R17, R18, R19, R20, R21, R25, R26, R27, R29, R30, R31, R34, R35, R36, R37, R38, R49	Support	<p>NHoŌ agrees that these activities do not have a functional need to be located in the CMA and therefore should not be enabled as a permitted activity. While the likelihood of these activities occurring in the CMA is small, the operative drafting provides no mechanism to require resource consent to consider any potential effects on the environment.</p> <p>The CMA is a culturally significant area to Ngā Hapū. The CMA is an area where we maintain our connection with mahinga kai, cultural practices, values and wāhi tapu. It is of the utmost importance that the CMA is provided the appropriate protection through the regional plan.</p>	Allow the submission points.
Forest & Bird	S261.211	Schedule F1: Rivers and lakes with significant indigenous ecosystems	Support in part	NHoŌ support the proposed amendments to Schedule F1 to amend the status of indigenous fish species and include new indigenous fish species in Schedule F1.	Allow the submission point.
Environmental Defence Society Inc.	S222.119-122	Schedule F2a: Significant habitats for indigenous birds in rivers; Schedule F2b: Significant habitats for indigenous birds in lakes;	Support in part	<p>NHoŌ support the proposed amendments to Schedule F2a, F2b, F2c and F4 to the extent that they update the status of indigenous bird species and include new species.</p> <p>We note that we would like to explore with GWRC including further sites to these Schedules at the appropriate time. Through our kaitiaki and their observations, as well as our research conducted, we have observed indigenous species at sites not</p>	Allow the submission point.

		<p>Schedule F2C Significant habitats for indigenous birds in the coastal marine area;</p> <p>Schedule F4: Sites with significant indigenous biodiversity values in the CMA</p>		<p>currently included in the Schedule. Schedules must be continually reviewed and updated to ensure that taonga species are protected across the rohe. As kaitiaki, we are obligated to ensure that taonga species are protected through mechanisms such as the regional plan. As Te Tiriti partners we look forward to working together with Greater Wellington Regional Council to Schedule additional sites in the future.</p>	
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## Further Submitter Details

**Further Submitters Name** NZ Agricultural Aviation Association

**Further Submitter Number** FS6

## Further Submission Points

The table below displays all existing further submitter points linked to the further submitter above that are already in the database. To add another further submission point, use the form below the table.

FS Point Number	Original submitter	Related submission point	FS support oppose	Plan provision	Reasons	Decision requested	Decision sought	Notes	Status	Edit
No Data										

## Raw further submission points

This table shows raw further submission points that have been entered via an online submissions.

Raw FS number	Related Submission Point	SupportOppose	FS Decision requested	Decision sought	Reasons	Entered into Spoken?	Transfer directly
FS6.1	S227.004	Support	Allow	NZAAA agrees that exact compliance with label conditions is restrictive for commercial agrichemical users.	The New Zealand Standard for the Management of Agrichemicals, and that requirements have, through the Standards NZ process, been confirmed as reasonable minimum requirements for agrichemical use in workplaces but they retain flexibility for off-label use where it is appropriate.	No	<a href="#">Transfer directly...</a>

FS6.2	S227.001	Support	Allow	Only agrichemicals with hazardous properties are approved by the EPA therefore non-hazardous agrichemicals would not be permitted	The use of non-hazardous agrichemicals should be a permitted activity.	No	<a href="#">Transfer directly...</a>
FS6.3	S227.002	Support	Allow	5.1.13 (e) requires the user to follow the label but there are situations where users of agrichemicals may not follow the label including crops where the product has not been formally approved.	There are many situations where agrichemicals may be applied off label for primary production and weed and pest control.	No	<a href="#">Transfer directly...</a>
FS6.4	S227.005	Support	Allow	Amend R38(e)(ii) to reference NZS 8409: 2021 Appendix G3 to provide clarity.	NZAAA agrees that notification requirements are too vague except for public spraying (g) and that appendix G3 requirements balances applicators and neighbour's needs	No	<a href="#">Transfer directly...</a>

## Add Further Submission Point

### Related original Submitter \*

S1 ▼

### Related submission point \*

Select ▼

### FS support oppose

Select ▼

### Reasons

### Decision sought



**New Zealand Farm Forestry Association  
Oranga Rākau Aotearoa**

Environmental Policy,  
Greater Wellington Regional Council  
PO Box 11646, Manners St  
WELLINGTON 6142  
ATT: Hearings Adviser  
By email to [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

**FURTHER SUBMISSION ON “Plan Change 1 to the Natural Resources Plan”**

Submitter: New Zealand Farm Forestry Association (NZFFA)

Address: New Zealand Farm Forestry Association  
9th Floor, 93 The Terrace, Wellington  
PO Box 10 349,  
The Terrace  
Wellington 6140

Submitted by: Egon Guttke

About this organization: The NZFFA represents people who own small-scale private forests and/or are interested in the many values of trees. Currently we have over 1200 members representing a good cross-section of the approximately 16,000 entities owning private forests in New Zealand. In the Wellington region, the NZFFA has about 100 members with direct interests or ownership in small scale forestry.

Contact details for this submission are:

Submitter: New Zealand Farm Forestry Association

Submitted by: Egon Guttke

Contact address:

Email: [Egon.Guttke@outlook.co.nz](mailto:Egon.Guttke@outlook.co.nz)

Phone:

**Statement of further submission:**

We oppose the submission points relating to forestry in  
submissions 188 - Wellington Fish and Game Regional Council  
240 - Porirua City Council  
222 - Environmental Defence Society  
261 - Forest & Bird

Egon Guttke  
NZ Farm Forestry Association Inc.

13 December 2023.

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
  2. You can use the Further Submission Form(s) (Form 6).
    - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
    - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).
- Please send the Further Submission Form in by one of the below methods:
- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
  - Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
  - Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.


Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
<b>Name of Submitter:</b> (First and last name, or organisation / company)	Orogen Limited
<b>Address for service:</b> (Email, or physical address) Please note an <u>email address</u> is the preferred method	darcy.brittlyff@orogen.nz
<b>Phone:</b> (Optional)	N/A
<b>Contact person for submission:</b> (If different to above)	Darcy Brittlyff or Ants Ransley
<b>I wish to be heard in support of my submission at a hearing:</b>	No



I would consider presenting a joint case at the hearing with others who make a similar submission:	No
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	We are an active Professional Services company applying for, managing, and reporting compliance for Regional Consents.

<b>3. For the further submitter to action</b>
Service of your further submission: Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b> Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a> . If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		8 <sup>th</sup> March 2024
<p><u>Public information:</u> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: Suggested added text, shown as <b>bolded text</b> format Suggested deleted text, shown as <del>struck through</del> format</li> </ul>

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<p><b>*Submitter name or, Submitter number of the submission you are commenting on:</b></p>	<p><b>*Submission point number:</b> <i>Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:</i></p>	<p><b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i></p>	<p><b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i></p>	<p><b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
Carrus Corporation Ltd	S247.001	Support	Allow submission	Provide a definition for 'Greenfields' development.	Refer Orogen S239.002
Carrus Corporation Ltd	S247.004	Support in Part	Allow submission	Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter.	<p>PC1 presents unworkable policies listed in our original decision.</p> <p>The impact of PC1 on the civil construction sector and the development community have not been considered.</p>
Carrus Corporation Ltd	S247.007	Support	Allow submission	Adopt requested decision.	To provide for sensible alignment of small development/ building regulations
Carrus Corporation Ltd	S247.008	Support	Allow submission	Adopt submission to enable smaller greenfield developments	<p>Refer to Orogen submission points S239.008 &amp; S239.016.</p> <p>Smaller greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits.</p>

					A planning pathway needs to be enabled through PC1 for such developments.
Carrus Corporation Ltd	S247.009, S247.019, & S247.021	Support	Allow submission	Adopt submission to enable unplanned greenfield development.	Refer to Orogen submission point S239.008 & S239.016  Greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits.  A planning pathway needs to be enabled through PC1 for such developments.
Carrus Corporation Ltd	S247.011	Support	Allow submission	Delete policy.	Greenfield developments can be designed to have effective stormwater management systems.  This policy does not enable modern stormwater engineering consideration greenfield development.
Carrus Corporation Ltd	S247.012, S247.020 & S247.025	Support	Allow submission	Delete policies and amend related rules.	Refer to Orogen submission S239.004 & S239.012  Winter works is currently effectively managed through current sediment control practices and winter approval procedures.  High rainfall events that provide risk to the environment occur outside of

					<p>the winter period which negate this policy.</p> <p>By the earthworks definition this policy impacts on all civil activities in the region and would cripple the civil industry. It needs to be removed as the environmental risks are effectively managed by industry best practice.</p>
<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b>	<b>*Stance on the submission point:</b>	<b>*Decision sought:</b>	<b>Decision sought:</b>	<b>Reasons:</b>
Civil Contractors New Zealand (CCNZ)	S285.001	Support	Allow submission	<p>Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter.</p> <p>Withdraw PC1 and provide a consultation path for a workable NRP.</p>	<p>The blanket policies ceasing winter works, influencing cleanfill, influencing stormwater will create greater costs for consenting and delivery as a short active construction year is now imposed by PC1 following a longer more complex planning pathway.</p> <p>The industry is effective with environmental management. Consultation will enable stronger policies to be established than the blanket detrimental policy in PC1. A risk based approach to earthworks provides a better</p>

					outcome for industry and compliance.
Civil Contractors New Zealand (CCNZ)	S285.003	Support	Allow submission	Regional enablement and planning is required to provide for Cleanfill, quarry, and landfill in the region.	<p>Cleanfill supports all aspects of the civil and building industry.</p> <p>Current rules and policies regarding Cleanfill have resulted in projects carting surplus material as far as Fielding from Wellington. The impact on our carbon footprint and transport network from this behavior is not desired by anyone.</p>
Civil Contractors New Zealand (CCNZ)	S285.006	Support	Allow submission in part	Review definition of <i>'earthworks'</i> .	<p>See Orogen submission point S239.003</p> <p>The point here from CCNZ reinforces our points that PC1 introduces ambiguity and real cost implications to industry and our society.</p>
Civil Contractors New Zealand (CCNZ)	S285.025, S285.030, S285.031 & S285.033	Support	Allow submission	Delete policy and amend associated rules.	<p>Refer to Orogen submission S239.004, S239.011, S239.012 &amp; S239.019</p> <p>A blanket policy for winter shutdown is inappropriate and identified by many submitters.</p> <p>A risk based approach to earthworks provides a better outcome for industry and compliance.</p>

Civil Contractors New Zealand (CCNZ)	S285.024 & S285.032	Support	Allow submission	Review definition of 'earthworks' as it applies to these rules.	See Orogen submission point S239.003
<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b>	<b>*Stance on the submission point:</b>	<b>*Decision sought:</b>	<b>Decision sought:</b>	<b>Reasons:</b>
Cuttriss Consultants Ltd	S219.001	Support	Allow submission	Provide a definition for 'Greenfields' development.	Refer Orogen S239.002
Cuttriss Consultants Ltd	S219.004	Support	Allow submission	Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter.	PC1 presents unworkable policies listed in our original decision.  The impact of PC1 on the civil construction sector and the development community have not been considered.
Cuttriss Consultants Ltd	S219.005	Support	Allow submission	Withdraw PC1 until the NPS-FM is resolved and provide clear alignment.	Inconsistency to NPS-FM provides conflict in project planning between PC1 & NPS-FM.
Cuttriss Consultants Ltd	S219.007	Support	Allow submission	Adopt requested decision.	To provide for sensible alignment of small development/ building regulations
Cuttriss Consultants Ltd	S219.008, S219.009, S219.019 & S219.021	Support	Allow submission	Adopt submission to enable unplanned greenfield development.	Refer to Orogen submission point S239.008 & S239.016  Greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits.  A planning pathway needs to be enabled through PC1 for such developments.

Cuttriss Consultants Ltd	S219.012, S219.020, S219.025 & S219.031	Support	Allow submission	Delete policy and amend associated rules.	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019  A blanket policy for winter shutdown is inappropriate and identified by many submitters.  A risk based approach to earthworks provides a better outcome for industry and compliance.
<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b>	<b>*Stance on the submission point:</b>	<b>*Decision sought:</b>	<b>Decision sought:</b>	<b>Reasons:</b>
Woodridge Holdings Limited	S255.001	Support	Allow submission	Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter.	Withdraw PC1 and provide a consultation path to establish a workable NRP as sought by the submitter.
Woodridge Holdings Limited	S255.030, S255.036, S255.048 & S255.062	Support	Allow submission	Adopt submission to enable unplanned greenfield development.	Refer to Orogen submission point S239.008 & S239.016  Greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits.  A planning pathway needs to be enabled through PC1 for such developments.
Woodridge Holdings Limited	S255.031 & S255.051	Support	Allow submission	Delete policy and amend associated rules.	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019

					<p>A blanket policy for winter shutdown is inappropriate and identified by many submitters.</p> <p>A risk based approach to earthworks provides a better outcome for industry and compliance.</p>
Woodridge Holdings Limited	S255.037 & S255.038	Support	Allow submission	Adopt submission to review stormwater discharge standards and redraft PC1	See Orogen submission point S239.009
Woodridge Holdings Limited	S255.039 & S255.074	Support	Allow submission	Delete policy and amend associated rules.	<p>Refer to Orogen submission S239.004, S239.011, S239.012 &amp; S239.019</p> <p>A blanket policy for winter shutdown is inappropriate and identified by many submitters.</p> <p>A risk based approach to earthworks provides a better outcome for industry and compliance.</p>
<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b>	<b>*Stance on the submission point:</b>	<b>*Decision sought:</b>	<b>Decision sought:</b>	<b>Reasons:</b>
Dave McKeivitt	S190.001 & S190.005	Support	Allow submission	Adopt submission	See Orogen submission points S239.010 & S239.018
Dave McKeivitt	S190.002 & S190.006	Support	Allow submission	Adopt submission to amend rules.	Refer to Orogen submission S239.004, S239.011, S239.012 & S239.019



					<p>A blanket policy for winter shutdown is inappropriate and identified by many submitters.</p> <p>A risk based approach to earthworks provides a better outcome for industry and compliance.</p>
Dave McKeivitt	S190.004 & S190.008	Support	Allow submission	Adopt submission to enable NTU measurements and undertake risk-based approach to winter works.	See Orogen submission S239.010, S239.011, S239.018 & S230.019
<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b>	<b>*Stance on the submission point:</b>	<b>*Decision sought:</b>	<b>Decision sought:</b>	<b>Reasons:</b>
Goodman Contractors Ltd	S274.002	Support	Allow submission	Agree	NTU measurement is more appropriate as per Orogen S239.010
Goodman Contractors Ltd	S274.003	Support	Allow submission	Delete policy and amend associated rule.	<p>Refer to Orogen submission S239.012 &amp; S239.019</p> <p>A blanket policy for winter shutdown is inappropriate and identified by many submitters.</p> <p>A risk based approach to earthworks provides a better outcome for industry and compliance.</p>
Goodman Contractors Ltd	S274.004	Support	Allow submission	Agree	A risk based approach to water use can be allowed in a Construction Management Plan for a Resource Consent.

<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b>	<b>*Stance on the submission point:</b>	<b>*Decision sought:</b>	<b>Decision sought:</b>	<b>Reasons:</b>
Fulton Hogan Ltd	S43.013, S43.018, S43.025 & S43.030	Support	Allow submission	Delete policies and amend associated rules.	Refer to Orogen submission S239.012 & S239.019  A blanket policy for winter shutdown is inappropriate and identified by many submitters.  A risk based approach to earthworks provides a better outcome for industry and compliance.
<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b>	<b>*Stance on the submission point:</b>	<b>*Decision sought:</b>	<b>Decision sought:</b>	<b>Reasons:</b>
Peka Peka Farm Limited	S251.007, S251.009, S251.012 & S251.014	Support	Allow submission	Adopt submission to enable unplanned greenfield development.	Refer to Orogen submission point S239.008 & S239.016  Greenfield developments can be appropriately designed to manage all effects and therefore should be considered on their merits.  A planning pathway needs to be enabled through PC1 for such developments.

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
  2. You can use the Further Submission Form(s) (Form 6).
    - [This](#) Further Submission Form(s) (Form 6) – Microsoft Word version; or
    - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version.](#)
- Please send the Further Submission Form in by one of the below methods:
- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
  - Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor.](#)
  - Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

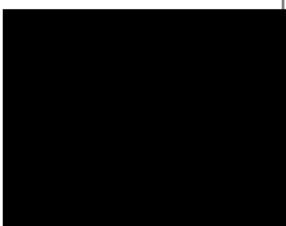
## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	PCL Contracting Ltd as part of CCNZ
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	luke@pclcontracting.co.nz
Phone: (Optional)	
Contact person for submission: (If different to above)	Luke Lee
I wish to be heard in support of my submission at a hearing:	Yes / <del>No</del>
I would consider presenting a joint case at the hearing with others who	Yes / <del>No</del>

make a similar submission:	
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes/ No
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes / <del>No</del>
C) I am the local authority for the relevant area.	Yes / No
Specify the reasoning behind why you qualify for either of these above options:	Civil Construction business owner

<b>3. For the further submitter to action</b>
<p>Service of your further submission:</p> <p>Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>	
<p>If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation</p>	 <p>08/03/2024</p>
<p><u>Public information:</u> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>	

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul> </li> </ul>

Please enter further submission points in the table on the following page(s)

## 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<p><b>*Submitter name or, Submitter number of the submission you are commenting on:</b></p>	<p><b>*Submission point number:</b> <i>Unique identifying number allocated to each specific <u>submission point</u>, located in the second column of the summary of decisions requested table:</i></p>	<p><b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i></p>	<p><b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i></p>	<p><b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
S285	001	Support	Support CCNZ submission	Considers PC1 will have significant impacts on the region's civil construction industry, will result in increased costs for ratepayers, and is unlikely to result in better environmental or consenting outcomes.	The potential economic impact to many companies will be significant, causing not only loss of businesses, reduced projects and housing, further delays in the consenting process with considerable impact on social outcomes. With reduced work, companies will be forced to restructure, causing an increase in unemployment. As with any proposed changes the proposal must take a holistic approach to considering all areas of impact.
S285	003	Support	Support CCNZ submission	Notes the region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill, and this is escalating project costs. Appreciates sediment control is an important factor when planning land use for cleanfill sites.	
S285	006 <i>Definition of earthworks</i>	Support	Support CCNZ submission	Considers the definition needs refinement as it will require considerable resource from industry to understand and implement, may escalate project costs, and result in worse outcomes and impact the ability for transport and water infrastructure networks to be repaired or	

				<p><i>maintained efficiently Considers the new definition for <i>Whaitua Te Whanganui-a-Tara</i> and <i>Te Awarua-o-Porirua</i> is not needed, as it applies the term too broadly. Considers the addition of 'to a cleanfill area' to 2.2 (i) is problematic as there are constraints around sites in the region at the moment and the availability of cleanfill sites needs to be taken into account as this could hamper the ability to deliver infrastructure projects. Notes the definition may result in consent applications being required for minor pipe or road repairs.</i></p>	
S285	008 <i>Impervious surfaces</i>	<i>Support</i>	<b>Support CCNZ submission</b>	<p><i>Amend definition as follows: Replace the reference to "stormwater" with 'rainfall', 'water', 'precipitation', or similar. Review and refine the list of exclusions in light of their implications for the rules. Refer to aggregate rather than metal. Remove duplicate references to 'porous or permeable paving'. Reconsider the reference to "reuse" which should be for 'non-potable purposes' to align with RPS language rather than 'grey water'. Reconsider the final two bullet points which have different approaches to permanent plumbing and use different terms for the same outcome (non-potable water use).</i></p>	
S285	013	<i>Support</i>	<b>Support CCNZ submission</b>	<p><i>Considers urgent works may not be able to wait for an ecologist's assessment and clause (n) may lead to poor environmental outcomes.</i></p>	<i>Will impact on the ability to undertake emergency works or result in non-conformance</i>
S285	0.14	<i>Support</i>	<b>Support CCNZ submission</b>	<p><i>Notes that inclusion of 'pipeline' excludes 'pipes' from this Rule as they have different dictionary definitions. Considers that pipes should be specifically mentioned</i></p>	

S285	016 Table 8.4	Support	Support CCNZ submission	Suspended fine sediment/deposited fine sediment Notes there is uncertainty regarding the modelled correlation between sediment loads and visual clarity and SedNet is a national scale model which has had to be adjusted to the scale of the target TAS locations. Considers increased granularity may lead to higher levels of uncertainty. Furthermore, sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL's control including human land uses and activities and natural factors.	
S285	018	Support	Support CCNZ submission	Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable	
S285	019 WH.P31	Support	Support	Seeks clarification on whether this clause stops all jobs in winter. Considers a 'hard shutdown' over winter will render civil construction and earthmoving companies unable to retain staff and increase project costs significantly. Considers the plan change does not take into account differences in material worked or terrain and that some winter works must be allowed via resource consents or some other avenue, if the	The potential economic impact to many companies will be significant, causing not only loss of businesses, reduced projects and housing, further delays in the consenting process with considerable impact on social outcomes. With reduced work, companies will be forced to restructure, causing an increase in unemployment. As with any proposed changes the proposal must take a holistic approach to considering all areas of impact. Providing

				site meets certain criteria. Notes some jobs (sand jobs) have much less sediment and runoff in rainfall and winter is actually a better time for these jobs to run, as there is less dust	companies with a 4 month shutdown is not economically viable and will force business out of the wellington region.
S285	021  WH.R5	Support	Support	Considers clause (c) is too vague as it does not specify what the hydrological controls have to achieve. Considers that (f) and (g) should not be occurring even if they are via the stormwater network and that it is the landowners responsibility to resolve.	
S285	.024  WH.R23	Support	Support CCNZ submission	Notes that many earthworks' activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. Concerns about capacity to perform this work.	Potential impact on government and local government works will be impacted due to shutdown periods and consent requirements
S285	.025  WH.R24	Support	Support CCNZ submission	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is	Strongly agree opposing the winter shutdown period of winter works



				<p>not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays</p>	
S285	.026 - WH.R33 .027 – WH.R34 .028 – WH.R35 .029 – WH.R36	Support	Support submission CCNZ	<p>Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.</p>	<p>The use of standpipes is vital for the drawing of water for construction activities and reduces environmental dust</p>
S285	.030 – P.P28	Support	Support submission CCNZ	<p>Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be able to be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time, and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.</p>	<p>This does not take into account local conditions like Kapiti were working in sand is better to be done in winter where moisture in the sand helps with compaction and dust control. Areas in winter months 1 June to 31 September quite often have less rainfall than in the spring months from 1 October to 31st December where traditionally the Wellington region suffers from large storm events and risk of runoff from sediment is far worse. We recommend that winter work still be available and all parties work collaboratively ( as we currently do ) to mitigate the risk through the same controls that are in place currently and during the other 8 months of the year. Limiting areas permitted doesn't consider low risk areas like flat farmland where sediment pods and run-off is minimal and where stabilisation plans can be used to mitigate run-off effectively before any rainfall events. The one rule fits all scenario will reduce productivity by effectively 33% for businesses that require year-round work in earthworks and with trenching being brought into the earthworks umbrella, it now means that a lot of Civil companies may have to shut down</p>

					<p><i>for that period and become seasonal occupations. This then means workers and businesses will not be able to afford to operate in this country and infrastructure rebuilding works will slow to a point that the region as a whole will be crippled. This also prevents activities like clean fills opening and operating and they form a vital part of the region's ability to do any infrastructure work. By making it harder to pen and operate a clean fill, the companies have to look elsewhere to cart material which increases costs to all projects, emissions increase as trucks are having to travel further and more trucks are then required on the road creating more wear and tear on our infrastructure meaning the roads will have a shorter life</i></p>
S285	.031 – P.P29	Support	Support submission CCNZ	<p><i>Considers a hard shutdown of earthworks between 1 June and 30 September is inappropriate as many works may be able to be managed during this period with no adverse effects.</i></p>	
S285	.032 – WH.R23 WH.R24	Support	Support submission CCNZ	<p><i>Notes that many earthworks activities undertaken by contractors working for local authority transport teams and Waka Kotahi have significant public benefits but would be unable to meet the permitted activity conditions of proposed Rule WH.R23, inclusive of minor repairs and maintenance of three waters infrastructure. Notes that a burst pipe may require resource consent as a restricted discretionary activity under Rule WH.R24 and this could lead to hundreds of resource consent applications per annum for minor earthworks activities. Concerns about capacity to perform this work.</i></p>	

S285	.033	Support	Support submission CCNZ	Strongly opposes and considers the shutdown of earthworks between 1 June and 30 September is inappropriate as works may be managed during this period with no adverse effects. Notes test methodologies should be appropriate to how monitoring occurs on site and the industry uses turbidity as a measure for earthworks consents, whereas PC1 specifies a measure of total suspended solids. Concern that this requires a lab test which will take 1-2 weeks to report a result which is arbitrary because it is based on a point in time and suggests there is not enough lab testing capacity to conduct testing. Notes the impact of the type of material being worked and their relative exceedance of the 100g/m3 threshold. Considers it is unclear who a 'suitably qualified person' for monitoring discharge would be. Suggests the qualification needs to be achievable by contractors due to project costs and delays.	
S285	.034 – P.R30	Support	Support submission CCNZ	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	Civil works requires the drawing of water to assist in dust mitigation in civil construction work. The requirement to hold water on site for work activities and fill mobile plant on site such as milling machines is vital, as the ability to move these machines is not possible or financially viable for a company.
S285	.035 – P.R 31	Support	Support submission CCNZ	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	
S285	.036 – P.R32	Support	Support submission CCNZ	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	

S285	.037 – P.R33	Support	Support CCNZ submission	Considers amendments required to better allow for water take in relation to dust control, emergency works and other civil construction activities.	
S239	.002	Support	Support Orogen	Seeks the addition for a definition for "greenfield development", particularly for the application of Rules WH.R6 and P.R6	
S239	.003	Support	Support Orogen	Concerned the definition removes the former exclusions that apply in all other whitua, which are typically low-risk activities that required limited disturbance in comparison with earthwork activities that were not previously excluded. Considers including these former exclusions under the broad definition of 'earthworks' overstates the associated risk and will hamper development in the region. Notes that excluded activities may then have their own set of rules to manage their effects appropriately and acknowledge their lower risk.	Concerned that by limiting greenfield development to set areas prevents larger development when existing controls deal with SW runoff and treatment to a high level. Proposed rules are too inflexible and don't encourage site specific requirements that are encountered with the multitude of different soil types, Rule needs to be more flexible to involve a collaborative approach to manager runoff. This inflexibility will add significant cost to consenting and compliance process which contradicts Government overarching desire to reduce cost to housing and development and create more affordable housing. The cost to meet the requirements will inevitably create a lot of non-compliant runoff as the level being asked is to treat SW runoff to a point it is at the level of drinking water and is not practical and will put undue risk onto businesses that they would have to mitigate by increases pricing to employ scientists to sample and test on continuous sites. This cost when working on Local body works then is passed onto the ratepayers and if rates aren't increased then less work can be done for the same dollar spend which effectively puts pressure on the infrastructure that is already at breaking point
S239	.004	Support	Support Orogen	Does not support earthworks during the period 1st June to 30th September being a non-complying activity, however acknowledges that	This does not take into account local conditions like Kapiti were working in sand is better to be done in winter where moisture in the sand helps with compaction and dust control. Areas in winter

				<p><i>seasonal variations in rainfall and groundwater should be taken into consideration.</i></p>	<p><i>months 1 June to 31 September quite often have less rainfall than in the spring months form 1 October to 31st December where traditionally the Wellington region suffers from large storm events and risk of runoff from sediment is far worse. We recommend that winter work still be available and all parties work collaboratively ( as we currently do ) to mitigate the risk through the same controls that are in place currently and during the other 8 months of the year. Limiting areas permitted doesn't consider low risk areas like flat farmland where sediment pods and run-off is minimal and where stabilisation plans can be used to mitigate run-off effectively before any rainfall events. The one rule fits all scenario will reduce productivity by effectively 33% for businesses that require year-round work in earthworks and with trenching being brought into the earthworks umbrella, it now means that a lot of Civil companies may have to shut down for that period and become seasonal occupations. This then means workers and businesses will not be able to afford to operate in this country and infrastructure rebuilding works will slow to a point that the region as a whole will be crippled. This also prevents activities like clean fills opening and operating and they form a vital part of the region's ability to do any infrastructure work. By making it harder to pen and operate a clean fill, the companies have to look elsewhere to cart material which increases costs to all projects, emissions increase as trucks are having to travel further and more trucks are then required on the road creating more wear and tear on our infrastructure meaning the roads will have a shorter life</i></p>
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S239	.005	Support	Support Orogen	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	By not defining a greenfield development the interpretation is left up to individual officers that may have their own beliefs and agendas. Clarity is important so a clear directive can be sort for future planning. Also need to look at how this definition aligns with local body district plans as the unintended consequence is that rate payers will be paying rates on land that can be developed according to local body rules but the GWRC rules will supersede that and ratepayers and landowners will be up in arms - need alignment across all parties central, regional and local govt.'s so there isn't contradiction
S239	.006	Support	Support Orogen	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	By not defining a greenfield development the interpretation is left up to individual officers that may have their own beliefs and agendas. Clarity is important so a clear directive can be sort for future planning. Also need to look at how this definition aligns with local body district plans as the unintended consequence is that rate payers will be paying rates on land that can be developed according to local body rules but the GWRC rules will supersede that and ratepayers and landowners will be up in arms - need alignment across all parties central, regional and local govt.'s so there isn't contradiction
S239	.007	Support	Support Orogen	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	
S239	.008	Support	Support Orogen	Considers the application of the Prohibited activity status too widespread, particularly for minor extensions of impervious surfaces. Considers that various consenting pathways should be available to accommodate different scales of activities in unplanned greenfield areas.	

S239	.009	Support	Support Orogen	Considers the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at lower rates, even when the earthworks area is stabilised. Considers no earthworks will meet the permitted activity criteria, regardless of size and treatment.	This rule is designed for failure of compliance as it is too onerous to comply 100% of the time. The limits and requirements are to such a high standard that businesses will be unable to meet the requirements and face prosecution and fines. The risk is businesses refuse to continue and close their doors to avoid being fined and losing decades of hard work.
S239	.010	Support	Support Orogen	Considering the proposed TSS limit of 100g/m <sup>3</sup> is too restrictive and is a significant reduction from the existing threshold of 170 NTU that is currently imposed on land use consents. Considers that the proposed TSS limit has not been informed by empirical data on sediment control device performance across the Wellington region, or sufficient scientific evidence. States that the technical publications for PC1 do not mention the TSS standard of 100g/m <sup>3</sup> and considers there is a lack of connection between the technical reports on the receiving water bodies and the proposed discharge standard. Seeks for the discharge standard to be redrafted in accordance with the best information available, in accordance with Section 1.6 of the NPS-FM. Considers measuring turbidity (NTU) is a reliable proxy for TSS, noting the long testing period for TSS results. Considers the proposed discharge standard disincentivizes the use of high efficiency sediment devices, while increasing compliance risks. Concerned that the GWRC Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) does not provide sufficient guidance to comply with the standard. Considers	

				that the use of low efficiency devices will be encouraged, which will achieve compliance, however will decrease regional performance against target attribute states.	
S239	.011	Support	Support Orogen	Concerned with the proposed non-complying activity status, stating that at the time that consent is applied for, information is not accurate enough to forecast site conditions during the "winter earthworks" period, particularly for larger earthworks which span over preceding non-winter months. Considers a non-complying activity status and requiring the supporting information at the consenting phase will mean the quality of the information provided is poor and will be reliant on assumptions including the size and location of earthworks, the type of construction activities, the performance of the proposed sediment control devices, seasonal variations in the local environment, and the applicant's resourcing capabilities. Seeks for the retention of existing mechanisms for the applications for winter works, allowing for higher quality information to be provided.	
S239	.012	Support	Support Orogen	Does not support earthworks within the proposed winter period being a non-complying activity, however, acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.	<i>One rule for all does will not create a successful environmental plan and consideration must be taken into account of the site, ground material, and proposed mitigation.</i>
S239	.013	Support	Support Orogen	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	
S239	.014	Support	Support Orogen	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development".	



S239	.015	Support	Support Orogen	Considers there is ambiguity regarding "greenfield development". Seeks a definition for "greenfield development"
S239	.016	Support	Support Orogen	Considers the application of the Prohibited activity status too widespread, particularly for minor extensions of impervious surfaces. Considers that various consenting pathways should be available to accommodate different scales of activities in unplanned greenfield areas
S239	.017	Support	Support Orogen	Considers the discharge of sediment from earthworks is unavoidable even with the use of sediment controls. Cites the technical reports for PC1, which reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at lower rates, even when the earthworks area is stabilised. Considers no earthworks will meet the permitted activity criteria, regardless of size and treatment
S239	.018	Support	Support Orogen	Considers the proposed TSS limit of 100g/m <sup>3</sup> is too restrictive, and is a significant reduction from the existing threshold of 170 NTU that is currently imposed on land use consents. Considers the proposed TSS limit has not been informed by empirical data on sediment control device performance across the Wellington region, or sufficient scientific evidence. States that the technical publications for PC1 do not mention the TSS standard of 100g/m <sup>3</sup> and considers there is a lack of connection between the technical reports on the receiving water bodies and the proposed discharge standard. Seeks for the discharge standard to be redrafted in accordance with the best information available, in accordance with Section 1.6 of the NPS-FM. Considers measuring

				turbidity (NTU) is a reliable proxy for TSS, noting the long testing period for TSS results. Considers the proposed discharge standard disincentivises the use of high efficiency sediment devices, while increasing compliance risks. Concerned that the GWRC Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021) does not provide sufficient guidance to comply with the standard. Considers that the use of low efficiency devices will be encouraged, which will achieve compliance, however will decrease regional performance against target attribute states.	
S239	.019	Support	Support Orogen	Concerned with the proposed non-complying activity status, stating that at the time that consent is applied for, information is not accurate enough to forecast site conditions during the "winter earthworks" period, particularly for larger earthworks which span over preceding non-winter months. Considers a non-complying activity status and requiring the supporting information at the consenting phase will mean the quality of the information provided is poor and will be reliant on assumptions including the size and location of earthworks, the type of construction activities, the performance of the proposed sediment control devices, seasonal variations in the local environment, and the applicant's resourcing capabilities. Seeks for the retention of existing mechanisms for the applications for winter works, allowing for higher quality information to be provided.	Agree with the proposed .019 as will prevent poor quality information being provided at consenting stage.
S239	.020	Support	Support Orogen	Seeks for Schedule 28 to include all management practices as specified in the Water Sensitive Design for Stormwater: Treatment Device	

				Guideline (Farrant et al. 2019), particularly the inclusion of pervious paving.	
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# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Peka Peka Farm Limited
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	mitch@bbplanning.co.nz
Phone: (Optional)	Insert
Contact person for submission: (If different to above)	Mitch Lewandowski
I wish to be heard in support of my submission at a hearing:	Yes
I would consider presenting a joint case at the hearing with others who make a similar submission:	No

2. Criteria applicable to Further Submitter:	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	No
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	<p>Peka Peka Farm Ltd is a landowner that may be affected by the content of submissions to which this further submission relates.</p> <p>Peka Peka Farm Ltd has an interest in the development of PC1, as the provisions of PC1 may influence the development of provisions relevant to the Kāpiti whaitua in a subsequent plan change.</p>

3. For the further submitter to action
<p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

4. Disclosures:	
<p>If submitting on behalf of a company / organisation:</p> <p>I confirm that I have permission to provide this information on behalf of the company / organisation</p>	<div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <p>8 March 2024</p>
<p><b>Public information:</b></p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.</p> <p>You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>	

5. Further Submission:
<ul style="list-style-type: none"> <li>• The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> </ul>

- Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.
- If you are providing suggested text amendments to a provision, please do so in the following format:  
Suggested added text, shown as **bolded text** format  
Suggested deleted text, shown as ~~strikethrough~~ format

**Please enter further submission points in the table on the following page(s)**

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<p><b>*Submitter name or, Submitter number of the submission you are commenting on:</b></p>	<p><b>*Submission point number:</b> <i>Unique identifying number allocated to each specific <u>submission point</u>, located in the second column of the summary of decisions requested table:</i></p>	<p><b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i></p>	<p><b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i></p>	<p><b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
Cannon Point Development Ltd	S260.007  Policy WH.P31: Winter shut down of earthworks	Support	Allow	S260.007 in its entirety.	PPFL considers that winter earthworks can be appropriately managed and should not be subject to an additional resource consent requirement.
	260.017  Rule WH.R24: Earthworks – restricted discretionary activity	Support	Allow	S260.017 in its entirety.	PPFL considers that winter earthworks can be appropriately managed and should not be restricted.
Kāinga Ora	257.004  Interpretation – hydrological control	Support	Allow	257.004 in its entirety.	PPFL supports the need to better define hydrological control.
	257.001  Interpretation – new definition of greenfield development.	Support	Allow	257.001 in its entirety.	PPFL supports the need to include a definition of greenfield development.

	257.019 Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Support	Allow	257.019 in its entirety.	PPFL supports the outcomes identified by Kāinga Ora.
	S257.026 Policy WH.P31: Winter shut down of earthworks	Support	Allow	S260.007 in its entirety.	PPFL considers that winter earthworks can be appropriately managed and should not be subject to a resource consent requirement.
Best Farm Ltd	S254.006 Interpretation – hydrological control	Support	Allow	S254.006 in its entirety.	PPFL supports the need to better define hydrological control.
	S254.004 General comments - overall	Support	Allow	S254.004 in its entirety.	PPFL considers that central government direction has changed, or is in the process of changing, and pausing progress on PC1 will allow the Council to better take stock of central government direction. PC1 should either give effect to updated central government direction, or be withdrawn and replaced with a Plan Change that achieves this outcome.



Cuttriss Consultants Ltd	S219.001 Interpretation – new definition of greenfield development	Oppose in part	Disallow in part	The proposed definition of greenfield development.	PPFL supports the submitters request for a definition of greenfield development.  PPFL opposes the proposed definition as the definition could readily capture instances of brownfield development.
	S219.002 General comments	Support	Allow	S219.002 in its entirety.	PPFL considers that central government direction has changed, or is in the process of changing, and pausing progress on PC1 will allow the Council to better take stock of central government direction. PC1 should either give effect to updated central government direction, or be withdrawn and replaced with a Plan Change that achieves this outcome.
	S219.003 General comments	Support	Allow	S219.003 in its entirety	PPFL agrees with the submitter that PC1 creates potential conflicts with the requirements of the NPS-UD.

Porirua City Council	S240.033  Policy P.P2 – Management of activities to achieve target attribute states and coastal waster objectives.	Oppose in part	Disallow	S240.033 in its entirety.	PPFL supports the submitters concern regarding the prohibition of greenfield development.  However, PPFL considers that the relief sought of substituting ‘avoiding’ for ‘prohibiting’ does not address the underlying concern.
Arakura Plains Development Ltd	S173.005  General comments – stormwater management	Support	Allow	S173.005 in its entirety.	PPFL supports the submitters concerns relating to the application of hydrological controls and water sensitive urban design requirements at various scales of urban development and redevelopment.
	S173.007  Interpretation – hydrological control	Support	Allow	S173.007 in its entirety.	PPFL supports the need to better define hydrological control.
	S173.012  Policy WH.P10: Managing adverse effects of stormwater discharges.	Support	Allow	S173.012 in its entirety.	PPFL supports the concerns outlined by the submitter.

	S173.018 Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	Support	Allow	S173.018 in its entirety.	PPFL supports the concerns outlined by the submitter.
	S173.019 Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	Support	Allow	S173.019 in its entirety.	PPFL supports the concerns outlined by the submitter.
	S17.020 Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	Support	Allow	S173.020 in its entirety.	PPFL supports the concerns outlined by the submitter.
	S173.021 Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	Support	Allow	S173.021 in its entirety.	PPFL supports the concerns outlined by the submitter.
	S173.022 Rule WH.R12: All other stormwater discharges – non-complying activity.	Support	Allow	S173.022 in its entirety.	PPFL supports the concerns outlined by the submitter.

**Note:** Where the above submission identifies a rule or policy from one of the two whitua, and there is an equivalent provision in the other whitua chapter, PPFL's relief sought applies to any equivalent provision.

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)



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A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
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  2. You can use the Further Submission Form(s) (Form 6).
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    - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version.](#)
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- You must send a copy of your Further Submission to the original submitter.  
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1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Pukerua Holdings Limited
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	C/- Scope Planning Stephanie@scopeplanning.co.nz
Phone: (Optional)	Insert
Contact person for submission: (If different to above)	Insert
I wish to be heard in support of my submission at a hearing:	Yes
I would consider presenting a joint case at the hearing with others who make a similar submission:	No

2. Criteria applicable to Further Submitter:	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Pukerua Holdings Limited is a property developer with existing and ongoing development interests in the Wellington Region.

3. For the further submitter to action
<p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

4. Disclosures:		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		8 March 2024
<p><b>Public information:</b></p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

5. Further Submission:
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul> </li> </ul>

**Please enter further submission points in the table on the following page(s)**

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

*Submitter name or, Submitter number of the submission you are commenting on:	*Submission point number: Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:	*Stance on the submission point: (i.e. the further submitters stance on the original submission)	*Decision sought:  (Allow, Disallow, Allow in part, or Disallow in part)	Decision sought  Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.	Reasons:  Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
Upper Hutt City Council	S225.002	Support	Allow	Support submission point in full	Support this submission point that seeks a that GWRC undertakes a full legal and natural justice review of the provisions in light of the evolving national direction;
Upper Hutt City Council	S225.003	Support	Allow	Support submission point in full	Supports this submission point that seeks to amend the provisions to remove actions that conflict with or are more onerous than the 2023 National led government direction included in the Incoming Government Coalition agreements, November 2023 and letter from Chris Bishop dated 13 December 2023 which identifies changes to RMA, NPSFM, NESFW and NPS-IB prior to end of 2023.
Upper Hutt City Council	S225.006	Support	Allow	Support submission point in full	Support the need to amend the plan change to correctly implement national planning standards.
Upper Hutt City Council	S225.007	Support	Allow	Support submission point in full	Support the need to significantly amend the provisions which have a lack of higher

					order document direction or evidentiary support.
Upper Hutt City Council	S225.008	Support	Allow	Support submission point in full	Support the need to delete or significantly amend provisions which lack of any consideration of scale and significance and apply to all development without appropriate thresholds;
Upper Hutt City Council	S225.009	Support	Allow	Support submission point in full	Support the need to delete the addition of onerous requirements for existing consents;
Upper Hutt City Council	S225.014	Support	Allow	Support submission point in full	Support the need to delete provisions prohibiting urban expansion beyond existing urban zoned land, particularly where this does not align with recent rezoning notified before this plan change;
Upper Hutt City Council	S225.015	Support	Allow	Support submission point in full	Support the need to delete or significantly amend hydrological controls for all development, which are going beyond hydraulic neutrality, as these are unclear and seem to be overly onerous;
Upper Hutt City Council	S225.019	Support	Allow	Support submission point in full	Support the need to amend the proposed definition of a 'drain' that would result in all drains being considered 'modified streams'
Upper Hutt City Council	S225.023	Support	Allow	Support submission point in full	Agrees that there are fundamental issues with provisions requiring revision or deletion to ensure PC1 is reasonable, legally robust and practical to implement.
Upper Hutt City Council	S225.025	Support	Allow	Support submission point in full	Agrees with the concerns raised in relation to process, timing, and sequencing of aspects of the notified provisions of PC1. Agrees that there are numerous instances throughout PC1 where little regard to national policy direction and principles of natural justice have been considered and reasonableness /evidence base and practical implementation of provisions has been inconsistently applied.



Upper Hutt City Council	S225.026	Support	Allow	Support submission point in full	Agrees with the concerns raised that PC1 circumvents or undermines national directives. Concerned provisions will make urban development required by NPS-UD potentially impossible to deliver, through wrapping constraints around housing intensification direction.
Upper Hutt City Council	S225.032	Support	Allow	Support submission point in full	Agrees with the amendments sought to the definition of earthworks to reintroduce the exclusions.
Upper Hutt City Council	S225.046	Support	Allow	Support submission point in full	Supports the amendments sought to the definition of stormwater treatment system to provide flexibility.
Upper Hutt City Council	S225.048	Support	Allow	Support submission point in full	Supports amendments to the unplanned greenfield development map.
Upper Hutt City Council	S225.067	Support	Allow	Support submission point in full	Agrees with the amendments to Policy WH.P2 to seek that unplanned development is managed and not prohibited.
Upper Hutt City Council	S225.075	Support	Allow	Support submission point in full	Agree that the scope of Policy WH.P10 should be narrowed to apply only to stormwater networks not individual developments within a network, except for point source discharges to surface water.
Upper Hutt City Council	S225.077	Support	Allow	Support submission point in full	Agrees that it is inappropriate and unjust to require onsite stormwater systems to be installed, due to the 'like for like' replacement of impervious surfaces. Considers this places unnecessary burden on land owners seeking to undertake maintenance of their properties.
Upper Hutt City Council	S225.078	Support	Allow	Support submission point in full	Agrees with the concerns raised in relation to financial contributions.
Upper Hutt City Council	S225.093	Support	Allow	Support submission point in full	Agrees with the request to delete Policy WH.P31 relating to winter works.

Upper Hutt City Council	S225.098	Support	Allow	Support submission point in full	Supports the request to delete or amend the thresholds and financial contributions specified in Rule WH.R6.
Upper Hutt City Council	S225.099	Support	Allow	Support submission point in full	Agrees with the concerns raised with the implications of this rule that would mean application of financial contributions and costly significant upgrades, given requirements to both include costly stormwater systems within developments, as well as pay financial contributions under schedule 30 (i.e. double dipping of cost).
Upper Hutt City Council	S225.100	Support	Allow	Support submission point in full	Agrees with the concerns raised with the implications of this rule that would mean application of financial contributions and costly significant upgrades, given requirements to both include costly stormwater systems within developments, as well as pay financial contributions under schedule 30 (i.e. double dipping of cost).
Upper Hutt City Council	S225.102	Support	Allow	Support submission point in full	Agrees with the concerns regarding the implications of the 'redevelopment' definition and lack of thresholds in Rule WH.R11 for redevelopment.
Upper Hutt City Council	S225.104	Support	Allow	Support submission point in full	Agrees with the concerns with the implications and practicality of Rule WH.R13.
Upper Hutt City Council	S225.120	Support	Allow	Support submission point in full	Agrees that the rationale and basis for the proposed financial contributions needs to be reviewed.
Porirua City Council	S240.010	Support	Allow	Support submission point in full	Agrees that the definition of hydrological control needs to be amended to assist in implementation of associated rules.
Porirua City Council	S240.014	Support	Allow	Support submission point in full	Supports amendments to the definition of unplanned greenfield development to provide a consenting pathway for a proposal located in these areas that may

					have positive outcomes, including for freshwater.
Porirua City Council	S240.033	Support	Allow	Support submission point in full	Agrees that the prohibition of unplanned greenfield development may result in unintended consequences with no consenting pathway to consider a proposal located in this area that may have positive outcomes, including for freshwater.
Porirua City Council	S240.046	Support	Allow	Support submission point in full	Agrees that Policy P.P15 should be deleted as there is insufficient evidence base to support the prohibition of unplanned greenfield development.
Porirua City Council	S240.060	Support	Allow	Support submission point in full	Agrees that the current approach to winter works management should be maintained and agrees that Policy P.P29 should be deleted.
Kāinga Ora	S257.009	Support	Allow	Support submission point in full	Agrees that a full review of and expansion to the areas identified as existing, new and future urban areas.
Kāinga Ora	S257.019	Support	Allow	Support submission point in full	Agrees that the policy and associated rules introduces a significant cost to developers on a site. Also agrees that Policy WH.P14 reads like a rule and would be difficult to achieve through redevelopment of existing urban environments and could discourage brownfield development.
Kāinga Ora	S257.020	Support	Allow	Support submission point in full	Agree that the policy and rules relating to financial contributions should be deleted.
Kāinga Ora	S257.021	Support	Allow	Support submission point in full	Agree that the policy and rules relating to unplanned urban development should be deleted as there is not sufficient evidence base to treat unplanned greenfield development differently to planned development.


Kāinga Ora	S257.026	Support	Allow	Support submission point in full	Agrees that winter works can be adequately dealt with as a matter of discretion or via current practice.
Kāinga Ora	S257.028	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.029	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.030	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.031	Support	Allow	Support submission point in full	Agrees that WH.R11(b) does not provide alternative framework applicable to catchment based solutions for attenuation, control and treatment associated with "greenfield development", and doesn't allow for a corresponding reduction in cases where treatment exceeds the 85% requirement.
Kāinga Ora	S257.032	Support	Allow	Support submission point in full	Agrees with the removal of reference to financial contributions
Kāinga Ora	S257.038	Support	Allow	Support submission point in full	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.
Kāinga Ora	S257.048	Support	Allow	Support submission point in full	Agrees that the financial contributions policy and associated rules should be deleted.
Kāinga Ora	S257.054	Support	Allow	Support submission point in full	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.

Kāinga Ora	S257.056	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.057	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.058	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.059	Support	Allow	Support submission point in full	Agrees that the 1,000m2 thresholds of this rule is a low baseline for development and will impose a considerable regulatory burden and cost on development through consent requirements, which has not been adequately assessed within the s32 analysis.
Kāinga Ora	S257.064	Support	Allow	Support submission point in full	Agrees that an exclusion needs to be added to the earthworks permitted activity rule that exempts activities associated with the trenching of services.
Kāinga Ora	S257.065	Support	Allow	Support submission point in full	Agrees that winter works can be dealt with as a matter of discretion not a separate non-complying activity rule.
Kāinga Ora	S257.067	Support	Allow	Support submission point in full	Agrees that the policies, rules and schedules relating to financial contributions should be deleted.
Summerset Group Holdings Limited	S38.001	Support	Allow	Support submission point in full	Agrees that the definition of hydrological control needs to be amended to provide more specificity about what they actually are.
Summerset Group Holdings Limited	S38.002	Support	Allow	Support submission point in full	Agrees that roofing with rainwater collection complying with hydraulic neutrality rules should not be considered an impervious surface.

Summerset Group Holdings Limited	S38.007	Support	Allow	Support submission point in full	Agrees that the cost of the 85% treatment requirement on landowners/ developers, and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation, it is potentially inconsistent with the NPS-UD.
Summerset Group Holdings Limited	S38.010	Support	Allow	Support submission point in full	Agrees that the s32 statement that there is a higher risk for discharges of sediment over the winter months is incorrect.
Forest Enterprises	S111.002	Support	Allow	Support submission point in full	Agrees that rules WH.R17 to WH.R22 and Rules P.R16 to P.R21 neglect to acknowledge the precedence of the National Environmental Standards of Plantation Forestry (NESPF) and National Environmental Standards of Commercial Forestry (NESCF).
Forest Enterprises	S111.003	Support	Allow	Support submission point in full	Agrees that where councils are proposing a new rule that is more stringent than the NES-PF, there is a requirement to demonstrate the more stringent rule is justified in the context of the region/district in accordance with section 32(4) of the RMA.
Forest Enterprises	S111.004	Support	Allow	Support submission point in full	Agrees that there is a lack of justification and definition for erosion prone land.
Forest Enterprises	S111.006	Support	Allow	Support submission point in full	Agrees that NES-CF has rules and controls for total suspended solids and plantation forestry discharge and seeks justification on how rules in PC1 provide greater positive environmental outcomes.
Forest Enterprises	S111.016	Support	Allow	Support submission point in full	Agrees that Rule P.R16 does not acknowledge the precedence of the NES-PF and NES-CF
Forest Enterprises	S111.017	Support	Allow	Support submission point in full	Agrees that Rule P.R17 does not acknowledge the precedence of the NES-PF and NES-CF
Forest Enterprises	S111.018	Support	Allow	Support submission point in full	Agrees that Rule P.R18 does not acknowledge the precedence of the NES-PF and NES-CF
Forest Enterprises	S111.018	Support	Allow	Support submission point in full	Agrees that Rule P.R19 does not acknowledge the precedence of the NES-PF and NES-CF
Forest Enterprises	S111.018	Support	Allow	Support submission point in full	Agrees that Rule P.R20 does not acknowledge the precedence of the NES-PF and NES-CF
Forest Enterprises	S111.018	Support	Allow	Support submission point in full	Agrees that Rule P.R21 does not acknowledge the precedence of the NES-PF and NES-CF

Please enter your details below:

**1. Details of further submitter:**

<b>* Submitter Name:</b> Full name, or Name of Organisation / Company	R P Mansell; A J Mansell; M R Mansell
<b>Contact person for submission:</b> (If different to above)	Chris Hansen
<b>Telephone no:</b> (Not required)	
<b>* Address for service:</b> (Email, or physical address) Please note, an <u>email address</u> is the preferred method	<a href="mailto:chris@rmaexpert.co.nz">chris@rmaexpert.co.nz</a>
<b>* I wish to be heard in support of my submission at a hearing</b>	Yes
<b>* I would consider presenting a joint case at the hearing with others who make a similar submission</b>	Yes


**2. Criteria applicable to Further Submitter:**

<b>* Only certain people may make further submissions Please select the option that applies to you:</b>	
<b>A) I am a person representing a relevant aspect of the public interest; or</b>	Yes
<b>B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or</b>	Yes
<b>C) I am the local authority for the relevant area.</b>	No
<b>* Specify the reasoning behind why you qualify for either of these above options:</b>	We made a previous submission on this plan change and have a greenfield development that may be affected if the amendments proposed by some submitters are taken through into PC1 and then applied through a further plan change to the Kapiti District

**3. For the further submitter to action**

<p>Service of your further submission: Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b> Each submitter has an address for service available at: <a href="#">NRP PC1 Address for Service</a></p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>	
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**4. Disclosures:**

<p>If providing a submission on behalf of a company / organisation <b>I confirm that I have authority to do so:</b></p>	
<b>Date:</b>	8-Mar-24

Public information:

Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.

In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the below:

[Plan Change 1 to the Natural Resources Plan Information Statement.](#)

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at [privacy@gw.govt.nz](mailto:privacy@gw.govt.nz).

**5. Further Submission:**

- The original submissions received have been summarised into submission points and collated into one summary table.

This document(s) is a Summary of Decisions Requested:

[NRP PC 1 - Summary of Decisions Requested – By Submitter](#)

[NRP PC 1 - Summary of Decisions Requested –By Provision](#)

- Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.

- If you are providing suggested text amendments to a provision, please do so in the following format:

- Suggested added text, shown as **bolded text** format

- Suggested deleted text, shown as ~~striketrough~~ format

Please enter your Further Submission in the next worksheet. All of the original submitters and their associated submission points on the proposed change have been included so please place your comments in the corresponding cells.

If you have questions on how to use this submission form please email one of our friendly team at [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)



Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Filter by the original submitter Name and associated Submitter Number	Unique identifying number allocated to each specific submission point	Support Oppose Support in part Oppose in part Not stated	Allow Disallow Allow in part Disallow in part	Illustrate which aspects of this original submission that you support or oppose.  Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.	Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
S225 - Upper Hutt City Council	S225.015	Support	Allow	Delete or significantly amend hydrological controls for all development, which are going beyond hydraulic neutrality, as these are unclear and seem to be overly onerous	Request represents good planning practice and is pragmatic and reasonable
S225 - Upper Hutt City Council	S225.005	Support	Allow	Amend maps as requested in submission	Submission is consistent with the Mansell's own submission and the concern regarding the accuracy of the Maps at a property scale and using correct data
S225 - Upper Hutt City Council	S225.020	Support	Allow	Delete or amend the additional financial contributions relating to stormwater management	Submission raises key matter regarding lack of justification and an understanding of monitoring of these projects
S225 - Upper Hutt City Council	S225.009	Support in part	Allow in part	Delete or amend Rule WH.R6 to remove thresholds and financial contributions	Submitter raises a real concern that application of financial contributions could result in double dipping which is inappropriate and does not represent good planning practice
S225 - Upper Hutt City Council	S225.104	Support	Allow	Delete Rule WH.R13 or amend significantly to change from prohibited and provide a consenting pathway for unplanned greenfield developments	Submission is consistent with the Mansell's own submission and the concern regarding prohibiting unplanned greenfield development which does not represent good planning practice and is inconsistent with the NPS-UD
S225 - Upper Hutt City Council	S225.120	Support in part	Allow in part	Remove requirements to pay financial contributions from Schedule 30	Submitter raises a real concern that application of financial contributions could result in double dipping which is inappropriate and does not represent good planning practice
S206 - Winstone Aggregates	S206.020	Support	Allow	Retain financial contribution offsetting as optional	Request represents good planning practice as the PC1 provides for other forms of aquatic offsetting and aquatic compensation is enabled where aquatic offsetting cannot be achieved and retaining financial contribution offsetting as an option is appropriate
S206 - Winstone Aggregates	S206.053	Support in part	Allow in part	Delete clause (b) from Rule WH.R11 regarding the need for financial contributions for greenfield development	Request represents good planning practice
S206 - Winstone Aggregates	S206.081	Support in part	Allow in part	Delete clause (b) from Rule P.R10 regarding the need for financial contributions for greenfield development	Request represents good planning practice

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
S177 - Transpower New Zealand Limited	S177.007	Support	Allow	Remove mandatory requirement for financial contributions as a condition of rules relating to stormwater management	Request represents good planning practice and has legal merit
S188 - Wellington Fish and Game Regional Council	S188.012	Oppose	Disallow	Retain the intent and wording of Policies WH.P10 and P.P10 as notified	The need to demonstrate functional need is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S188 - Wellington Fish and Game Regional Council	S188.013	Oppose	Disallow	Retain the current approach in the objectives and policies and not add the requirement to demonstrate functional need	The need to demonstrate functional need is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.002	Oppose in part	Disallow in part	Retain Target Attribute States as per notified PC1	The need for the additional TAS relating to 'natural form and character' is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.049	Oppose in part	Disallow in part	Retain the wording of Objective WH.O1 as notified	The need to add a reference to 'ephemeral watercourses' is opposed as including these waterbodies in the objective is unnecessary and impractical and is not necessary to implement the NPS-FM or the purpose of the RMA is achieved
S261 - Forest & Bird	S261.050	Oppose in part	Disallow in part	Retain the wording of Objective WH.O2 as notified	The need to add a reference to 'ephemeral watercourses' and 'natural form and character' is opposed as including these waterbodies in the objective is unnecessary and impractical and is not necessary to implement the NPS-FM or the purpose of the RMA is achieved
S261 - Forest & Bird	S261.060	Oppose	Disallow	Retain wording of Objective WH.O9 as notified	The need for the additional wording 'natural form and character' is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.062	Oppose in part	Disallow in part	Retain the wording of Policy WH.P1 as notified, subject to the amendment sought by the Mansell's in their original submission	The need for the additional wording 'natural form and character' and the requirement to restore natural form and character is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
S261 - Forest & Bird	S261.063	Oppose	Disallow	Retain the wording of Policy WH.P2 as notified, subject to the amendment sought by the Mansell's in their original submission	The need to prohibit and avoid adverse effects of unplanned greenfield development; include ephemeral watercourses; and prohibiting land use intensification that individually or collectively may lead to a decline in water quality is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.067	Oppose	Disallow	Retain the wording of Policy WH.P5 as notified, subject to the amendment sought by the Mansell's in their original submission	The need to amend the policy to apply to all discharges is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.090	Oppose	Disallow	Retain the wording of Policy WH.P29 as notified	The need to require setback distances is not required in the NRP as the NES-FM already addresses this matter
S261 - Forest & Bird	S261.099	Oppose	Disallow	Retain permitted activity status of Rule WH.R5 as notified	The need to reclassify the activity status to controlled is not necessary as the permitted activity conditions are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S261 - Forest & Bird	S261.100	Oppose	Disallow	Retain controlled activity status of Rule WH.R6 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of control are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S261 - Forest & Bird	S261.116	Oppose	Disallow	Retain the wording of Rule WH.R23 as notified	The additional standards sought by the submitter include matters already addressed in the NPS-FM and are not required in the NRP and are not necessary to implement the NES-FM or to achieve the purpose of the RMA; including reference to ephemeral watercourses is unnecessary and inappropriate
S261 - Forest & Bird	S261.117	Oppose	Disallow	Retain restricted discretionary activity status of Rule WH.R24 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of discretion are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S261 - Forest & Bird	S261.133	Oppose in part	Disallow in part	Retain the wording of Objective P.O1 as notified	The need to add a reference to 'ephemeral watercourses' is opposed as including these waterbodies in the objective is unnecessary and impractical and is not necessary to implement the NPS-FM or the purpose of the RMA is achieved
S261 - Forest & Bird	S261.134	Oppose in part	Disallow in part	Retain the wording of Objective P.O2 as notified	The need to add a reference to 'ephemeral watercourses' and 'natural form and character' is opposed as including these waterbodies in the objective is unnecessary and

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					impractical and is not necessary to implement the NPS-FM or the purpose of the RMA is achieved
S261 - Forest & Bird	S261.139	Oppose	Disallow	Retain wording of Objective P.O6 as notified	The need for the additional wording 'natural form and character' is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.141	Oppose in part	Disallow in part	Retain the wording of Policy P.P1 as notified, subject to the amendment sought by the Mansell's in their original submission	The need for the additional wording 'natural form and character' and the requirement to restore natural form and character is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.142	Oppose	Disallow	Retain the wording of Policy P.P2 as notified, subject to the amendment sought by the Mansell's in their original submission	The need to prohibit and avoid adverse effects of unplanned greenfield development; include ephemeral watercourses; and prohibiting land use intensification that individually or collectively may lead to a decline in water quality is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.147	Oppose	Disallow	Retain the wording of Policy P.P5 as notified	The need to amend the policy to apply to all discharges is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S261 - Forest & Bird	S261.169	Oppose	Disallow	Retain the wording of Policy P.P27 as notified	The need to require setback distances is not required in the NRP as the NES-FM already addresses this matter
S261 - Forest & Bird	S261.176	Oppose	Disallow	Retain permitted activity status of Rule P.R5 as notified	The need to reclassify the activity status to controlled is not necessary as the permitted activity conditions are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S261 - Forest & Bird	S261.177	Oppose	Disallow	Retain controlled activity status of Rule P.R6 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of control are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S261 - Forest & Bird	S261.193	Oppose	Disallow	Retain the wording of Rule P.R22 as notified	The additional standards sought by the submitter include matters already addressed in the NPS-FM and are not required in the NRP and are not necessary to implement the NES-FM or to achieve the purpose of the RMA; including reference to ephemeral watercourses is unnecessary and inappropriate
S261 - Forest & Bird	S261.194	Oppose	Disallow	Retain restricted discretionary activity status of Rule P.R23 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of discretion are robust and

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S169 - KORU HOMES NZ LIMITED	S169.006	Support in part	Allow in part	Delete clause (a) from Policy WH.P2 regarding the need for financial contributions for greenfield development	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.007	Support in part	Allow in part	Delete reference to financial contributions from Policy WH.P10	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.008	Support in part	Allow in part	Delete reference to financial contributions from Policy WH.P15	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.013	Support in part	Allow in part	Delete reference to financial contributions from Rule WH.R5	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.014	Support in part	Allow in part	Delete reference to financial contributions from Rule WH.R6	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.016	Support in part	Allow in part	Delete reference to financial contributions from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.021	Support in part	Allow in part	Delete clause (a) from Policy P.P2 regarding the need for financial contributions for greenfield development	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.022	Support in part	Allow in part	Delete reference to financial contributions from Policy P.P10	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.023	Support in part	Allow in part	Delete reference to financial contributions from Policy P.P14	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.028	Support in part	Allow in part	Delete reference to financial contributions from Rule P.R5	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.029	Support in part	Allow in part	Delete reference to financial contributions from Rule P.R6	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S169 - KORU HOMES NZ LIMITED	S169.031	Support in part	Allow in part	Delete reference to financial contributions from Rule P.R10	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
S169 - KORU HOMES NZ LIMITED	S169.036	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S222 - Environmental Defence Society Inc.	S222.023	Oppose in part	Disallow in part	Retain the wording of Objective WH.O2 as notified	The need to add a reference to 'ephemeral watercourses' and 'natural form and character' is opposed as including these waterbodies in the objective is unnecessary and impractical and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.032	Oppose	Disallow	Retain wording of Objective WH.O9 as notified	The need for the additional wording 'natural form and character' is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.034	Oppose in part	Disallow in part	Retain the wording of Policy WH.P1 (b) as notified, subject to the amendment sought by the Mansell's in their original submission	The need for the additional wording 'natural form and character' and the requirement to restore natural form and character is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.035	Oppose	Disallow	Amend Policy WH.P2 as requested by the Mansell's in their original submission	The need to avoid (and not manage) adverse effects from earthworks and vegetation clearance activities is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.049	Oppose	Disallow	Retain the wording of Policy WH.P29 as notified	The need to require setback distances is not required in the NRP as the NES-FM already addresses this matter
S222 - Environmental Defence Society Inc.	S222.063	Oppose in part	Disallow in part	Retain the wording of Rule WH.R23 as notified	The greater setback sought by the submitter is not required in the NRP and are not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.064	Oppose in part	Disallow in part	Retain restricted discretionary activity status of Rule WH.R24 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of discretion are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S222 - Environmental Defence Society Inc.	S222.076	Oppose in part	Disallow in part	Retain the wording of Objective P.O2 as notified	The need to add a reference to 'ephemeral watercourses' and 'natural form and character' is opposed as including these waterbodies in the objective is unnecessary and

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					impractical and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.080	Oppose in part	Disallow in part	Retain the wording of Policy P.P1 (b) as notified, subject to the amendment sought by the Mansell's in their original submission	The need for the additional wording 'natural form and character' and the requirement to restore natural form and character is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.081	Oppose	Disallow	Amend Policy P.P2 as requested by the Mansell's in their original submission	The need to avoid (and not manage) adverse effects from earthworks and vegetation clearance activities is not required in the NRP and is not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.092	Oppose	Disallow	Retain the wording of Policy P.P27 as notified	The need to require setback distances is not required in the NRP as the NES-FM already addresses this matter
S222 - Environmental Defence Society Inc.	S222.105	Oppose in part	Disallow in part	Retain the wording of Rule P.R22 as notified	The greater setback sought by the submitter is not required in the NRP and are not necessary to implement the NPS-FM or to achieve the purpose of the RMA
S222 - Environmental Defence Society Inc.	S222.106	Oppose in part	Disallow in part	Retain restricted discretionary activity status of Rule P.R23 as notified	The need to reclassify the activity status to discretionary is not necessary as the matters of discretion are robust and appropriate and will ensure the implementation of the NPS-FM and the purpose of the RMA is achieved
S219 - Cuttriss Consultants Ltd	S219.008	Support in part	Allow in part	Delete definition of 'unplanned greenfield development'	The request is consistent with the Mansell's submission and represents good planning practice as the unplanned greenfield development definition is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S219 - Cuttriss Consultants Ltd	S219.009	Support	Allow	Amend Policy WH.P2 by deleting Clause (a) with reference to prohibiting unplanned greenfield development	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S219 - Cuttriss Consultants Ltd	S219.011	Support	Allow	Delete Policy WH.P16	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S219 - Cuttriss Consultants Ltd	S219.012	Support	Allow	Delete Policy WH.P31	The request is consistent with the Mansell's submission and represents good planning practice as winter shut down

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
					period to manage earthworks is inappropriate and does not implement the NPS-FM or achieve the purpose of the RMA
S219 - Cuttriss Consultants Ltd	S219.019	Support	Allow	Delete prohibited activity status of Rule WH.R13 and change activity status of stormwater from new unplanned greenfield development to discretionary activity	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting stormwater from unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S219 - Cuttriss Consultants Ltd	S219.020	Support	Allow	Delete Clause (b) of Rule WH.R24 regarding the winter shut down period to manage earthworks	The request is consistent with the Mansell's submission and represents good planning practice as winter shut down period to manage earthworks is inappropriate and does not implement the NPS-FM or achieve the purpose of the RMA
S219 - Cuttriss Consultants Ltd	S219.021	Support	Allow	Delete Clause (a) from Policy P.P2 regarding prohibiting unplanned greenfield development	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S219 - Cuttriss Consultants Ltd	S219.025	Support	Allow	Delete Policy P.P29	The request is consistent with the Mansell's submission and represents good planning practice as winter shut down period to manage earthworks is inappropriate and does not implement the NPS-FM or achieve the purpose of the RMA
S243 - Land Matters Limited	S243.030	Support	Allow	Delete Rule WH.R13	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting stormwater from unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S243 - Land Matters Limited	S243.029	Support	Allow	Delete Rule P.R12	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting stormwater from unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S243 - Land Matters Limited	S243.032	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S252 - Thames Pacific	S252.008	Support in part	Allow in part	Delete definition of 'unplanned greenfield development'	The request is consistent with the Mansell's submission and represents good planning practice as the unplanned greenfield development definition is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA



Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
S252 - Thames Pacific	S252.009	Support	Allow	Amend Policy WH.P2 by deleting Clause (a) with reference to prohibiting unplanned greenfield development	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S252 - Thames Pacific	S252.011	Support	Allow	Delete Policy WH.P16	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S252 - Thames Pacific	S252.012	Support	Allow	Delete Policy WH.P31	The request is consistent with the Mansell's submission and represents good planning practice as winter shut down period to manage earthworks is inappropriate and does not implement the NPS-FM or achieve the purpose of the RMA
S252 - Thames Pacific	S252.018	Support	Allow	Delete prohibited activity status of Rule WH.R13 and change activity status of stormwater from new unplanned greenfield development to discretionary activity	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting stormwater from unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S252 - Thames Pacific	S252.019	Support	Allow	Delete Clause (b) of Rule WH.R24 regarding the winter shut down period to manage earthworks	The request is consistent with the Mansell's submission and represents good planning practice as winter shut down period to manage earthworks is inappropriate and does not implement the NPS-FM or achieve the purpose of the RMA
S252 - Thames Pacific	S252.020	Support	Allow	Delete Clause (a) from Policy P.P2 regarding prohibiting unplanned greenfield development	The request is consistent with the Mansell's submission and represents good planning practice as prohibiting unplanned greenfield development is inappropriate and does not implement the NPS-UD or achieve the purpose of the RMA
S252 - Thames Pacific	S252.023	Support	Allow	Delete Policy P.P29	The request is consistent with the Mansell's submission and represents good planning practice as winter shut down period to manage earthworks is inappropriate and does not implement the NPS-FM or achieve the purpose of the RMA
S161 - GILLIES GROUP MANAGEMENT LTD	S161.021	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S161 - GILLIES GROUP MANAGEMENT LTD	S161.036	Support	Allow	Delete Clause (b) from Rule P.R10	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
S161 - GILLIES GROUP MANAGEMENT LTD	S161.041	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S165 - PUKERUA HOLDINGS LIMITED	S165.021	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S165 - PUKERUA HOLDINGS LIMITED	S165.036	Support	Allow	Delete Clause (b) from Rule P.R10	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S165 - PUKERUA HOLDINGS LIMITED	S165.041	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S173 - ARAKURA PLAINS DEVELOPMENT LIMITED	S173.021	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S173 - ARAKURA PLAINS DEVELOPMENT LIMITED	S173.036	Support	Allow	Delete Clause (b) from Rule P.R10	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S173 - ARAKURA PLAINS DEVELOPMENT LIMITED	S173.041	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S207 - Firth Industries Limited	S207.018	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S207 - Firth Industries Limited	S207.030	Support	Allow	Delete Clause (b) from Rule P.R10	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S236 - Parkvale Road Limited	S236.009	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way

Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
S236 - Parkvale Road Limited	S236.011	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S251 - Peka Peka Farm Limited	S251.008	Support	Allow	Delete Clause (b) from Rule WH.R11	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S251 - Peka Peka Farm Limited	S251.013	Support	Allow	Delete Clause (b) from Rule P.R10	Request represents good planning practice as the policy proposed to use financial contributions in an inappropriate way
S251 - Peka Peka Farm Limited	S236.015	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA
S43 - Fulton Hogan Ltd	S43.013	Oppose	Disallow	Delete the winter shut down requirements from Policy WH.P31, as sought by the Mansell's in their submission	The additional provisions sought to Policy WH.P31 regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA
S43 - Fulton Hogan Ltd	S43.017	Oppose	Disallow	Delete clause (b) from Rule WH.R24 regarding the earthworks winter shut down period	The additional provisions sought to Clause (b) regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA
S190 - David McKevitt	S190.002	Oppose	Disallow	Delete the winter shut down requirements from Policy WH.P31, as sought by the Mansell's in their submission	The additional provisions sought to Policy WH.P31 regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA
S190 - David McKevitt	S190.004	Oppose	Disallow	Delete clause (b) from Rule WH.R24 regarding the earthworks winter shut down period	The additional provisions sought to Clause (b) regarding the winter shut down period are unnecessary and impracticable and do not represent good planning practice, and would not implement the NPS-FM or achieve the purpose of the RMA
S241 - Pukerua Property Group Ltd	S241.038	Support	Allow	Delete Schedule 30	Request represents good planning practice as the schedule proposed to use financial contributions in an inappropriate way and is not necessary in the NRP to implement the NPS-UD or to achieve the purposes of the RMA

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
<b>Name of Submitter:</b> (First and last name, or organisation / company)	Rangitāne o Wairarapa Incorporated
<b>Address for service:</b> (Email, or physical address) Please note an <u>email address</u> is the preferred method	taiao@rangitane.iwi.nz
<b>Phone:</b> (Optional)	
<b>Contact person for submission:</b> (If different to above)	Amber Craig
<b>I wish to be heard in support of my submission at a hearing:</b>	Yes
<b>I would consider presenting a joint case at the hearing with others who</b>	Yes



#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<p><b>*Submitter name or, Submitter number of the submission you are commenting on:</b></p>	<p><b>*Submission point number:</b> <i>Unique identifying number allocated to each specific <u>submission point</u>, located in the second column of the summary of decisions requested table:</i></p>	<p><b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i></p>	<p><b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i></p>	<p><b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
Taranaki Whānui	S286.002	Support in part	Allow in part	We support in principle, however we believe a wananga with mana whenua across the region to determine the best approach to meet Taranaki Whānui's concerns would be appropriate as this will impact all Mana Whenua.	We wish to highlight the regional impact of this change, but want to ensure we move forward to address Taranaki Whānui's concerns with the best outcome for all mana whenua.
Taranaki Whānui	S286.001	Support in part	Allow in part	We support in principle, however we believe a wananga with mana whenua across the region to determine the best approach to meet Taranaki Whānui's concerns would be appropriate as this will impact all Mana Whenua.	We wish to highlight the regional impact of this change, but want to ensure we move forward to address Taranaki Whānui's concerns with the best outcome for all mana whenua.

Taranaki Whānui	S286.005	Support in part	Allow in part	We support in principle, however we believe a wananga with mana whenua across the region to determine the best approach to meet Taranaki Whānui's concerns would be appropriate as this will impact all Mana Whenua.	We wish to highlight the potential regional impact of this change, but want to ensure we move forward to address Taranaki Whānui's concerns with the best outcome for all mana whenua.
Taranaki Whānui	S286.006	Support	Allow	Allow the amendment.	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.003	Support	Allow	Allow the amendment.	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.004	Support in part	Allow in part	We support in principle, however we believe a wananga with mana whenua across the region to determine the best approach to meet Taranaki Whānui's concerns would be appropriate as this will impact all Mana Whenua.	We wish to highlight the regional impact of this change, but want to ensure we move forward to address Taranaki Whānui's concerns with the best outcome for all mana whenua.
Taranaki Whānui	S286.007	Support	Allow	Allow the amendment.	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.

Taranaki Whānui	S286.008	Support in part	Allow in part	We support in principle, however we believe a wananga with mana whenua across the region to determine the best approach to meet Taranaki Whānui's concerns. As this will impact all Mana Whenua.	We wish to highlight the regional impact of this change, but want to ensure we move forward to address Taranaki Whānui's concerns with the best outcome for all mana whenua.
Taranaki Whānui	S286.009	Support in part	Allow in part	We support in principle, however we believe a wananga with mana whenua across the region to determine the best approach to meet Taranaki Whānui's concerns. As this will impact all Mana Whenua.	We wish to highlight the regional impact of this change, but want to ensure we move forward to address Taranaki Whānui's concerns with the best outcome for all mana whenua.
Taranaki Whānui	S286.010	Support	Allow	Retain as notified.	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.011	Support	Allow	Retain as notified.	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.012	Support	Allow	Retain as notified.	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.013	Support	Allow	Retain as notified.	To support the outcomes Taranaki



					Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.014	Support	Allow	Retain as notified.	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.015	Support	Allow	Allow the amendment	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.016	Support	Allow	Allow the amendment	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.017	Support	Allow	Allow the amendment.	To support the outcomes Taranaki Whānui's are seeking in this submission as Mana Whenua.
Taranaki Whānui	S286.018 – S286.106	Support	Allow	Retain provisions as notified or allow amendments as per the submission from Taranaki Whānui.	We support the entirety of the submission in relation to Chapter 8 and support Taranaki Whānui's right to self-determination as per Te Tiriti o Waitangi.
Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.005-006	Support	Allow	Allow the amendments.	We support the whole of Submissions in relation to Chapter 8 and support Te Rūnanga o Toa Rangatira's right to self-

					determination as per Te Tiriti o Waitangi.
Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.007-008	Support	Allow	Allow the amendments.	We support the whole of Submissions in relation to Chapter 9 and support Te Rūnanga o Toa Rangatira's right to self-determination as per Te Tiriti o Waitangi.
Forest and Bird	S261.006	Support	Allow	Allow the amendments	We support Forest and Bird's submission on ensuring Te Mana o te Wai given effect to, as signaled in the recent RPS Change 1 and to give effect to the NPSFM.

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

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- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.


## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Rosco Ice Cream Ltd
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	C/- Spencer Holmes <a href="mailto:adg@spencerholmes.co.nz">adg@spencerholmes.co.nz</a>
Phone: (Optional)	
Contact person for submission: (If different to above)	
I wish to be heard in support of my submission at a hearing:	Yes
I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes

2. Criteria applicable to Further Submitter:	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	No
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Rosco Ice Cream Ltd made a primary submission and owns and / or leases land that would be affected by the proposed plan change and submissions.

3. For the further submitter to action
<p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

4. Disclosures:		
<p>If submitting on behalf of a company / organisation:</p> <p>I confirm that I have permission to provide this information on behalf of the company / organisation</p>		8/3/2024
<p><u>Public information:</u></p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.</p> <p>You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

5. Further Submission:
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul> </li> </ul>

Please enter further submission points in the table on the following page(s)

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

Submitter	Submission point:	Stance on the submission point:	Decision sought:	Decision sought:	Reasons:
S216 Te Runga o Toa Rangatira	S215.005	Support in part	Allow in part	Amend policy WH.P2 to <u>restrict</u> unplanned greenfield development – (instead of prohibiting unplanned greenfield development).	The use of a prohibited activity rule is too inflexible and conflicts with the NPS-UD (particularly Policies 2 & 8) and as such could prevent territorial authorities from meeting their ongoing requirements under the NPS-UD.
S216 Te Runga o Toa Rangatira	S215.006	Support	Allow	Amend rule WH.R13 to be a non-complying activity status (instead of a prohibited activity status).	The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.
S256 Waste Management NZ Ltd	S256.012	Support	Allow	Delete rule WH.R13 or amend it to be discretionary or non-complying status.	A non-complying activity, would ensure a full assessment of the effects of any proposal, including a policy assessment.
S256 Waste Management NZ Ltd	S256.014	Support	Allow	Remove the property at 30 Benmore Crescent from the 'unplanned greenfield area' as shown on Map 89.	The site is subject to existing consents and current consent applications for development of the property.  The draft District Plan by Lower Hutt City Council proposes that the property is zoned General Industrial.
S211 Hutt City Council	S211.025	Support in part	Allow in part	Amend Map 89 to align with identified housing and business demand in Hutt City – particularly as it relates to 30 Benmore Crescent to be removed from the 'unplanned greenfield area'.	Map 89 does not correctly represent the NPS-UD requirement to identify housing and business demand needed within Hutt City where 30 Benmore Crescent is identified as being needed for future business activities.

Submitter	Submission point:	Stance on the submission point:	Decision sought:	Decision sought:	Reasons:
S255 Woodridge Holdings Ltd	S255.009	Support	Allow	Amend definition of 'earthworks' to delete the separate definitions for Te Whanganui-a-Tara and Te Awarua-o-Porirua whaitua.	The proposed definition for the two whaitua removes all reasonable permitted exceptions from the current definition and only excludes gardening, cultivation and post holes.  The same earthworks definition should apply across the whole region.
S254 Best Farm Ltd	S254.005	Support	Allow		
S238 Greater Wellington Regional Council	S238.009	Oppose	Disallow	Do not allow changes to the definition of 'unplanned greenfield development' that introduce a specific date at which a zone change to an urban type zone would be required.	The introduction of a date (30 October 2023) to the definition means that even if property is changed to an urban type zone, it is still defined as an 'unplanned greenfield development'.

## Further Submitter Details

**Further Submitters Name** Save Our Hills (Upper Hutt) Incorporated

**Further Submitter Number** FS44

## Further Submission Points

The table below displays all existing further submitter points linked to the further submitter above that are already in the database. To add an another further submission point, use the form below the table.

FS Point Number	Original submitter	Related submission point	FS support oppose	Plan provision	Reasons	Decision requested	Decision sought	Notes	Status	Edit
No Data										

## Raw further submission points

This table shows raw further submission points that have been entered via an online submissions.

Raw FS number	Related Submission Point	SupportOppose	FS Decision requested	Decision sought	Reasons	Entered into Spoken?	Transfer directly
FS44.1	S210.032	Oppose	Disallow	Until the Pinehaven Floodplain Management Plan and flawed flood modelling are rectified we oppose development on the Pinehaven hills, especially on the Guildford Timber Company (GTC) land. We therefore oppose GTC submission in full and particularly Submission point S210.032 which must be disallowed.	We oppose GTC's request for WH.P16 to be deleted or amended as proposed by GTC because the fatally flawed Pinehaven flood model has left us with no confidence in GWRC flood modelling. Until a full and transparent independent investigation into GWRC's Pinehaven Stream Flood modelling is carried out and the flawed flood modelling properly rectified, policies claiming to "avoid or minimise adverse effects" of development carry no weight. The safety and wellbeing of Pinehaven community and the protection of the environment from the adverse effects of development on GTC land on the Pinehaven hills depends on accurate baseline flood modelling which GWRC has yet to deliver for the Pinehaven Stream catchment.	No	<a href="#">Transfer directly...</a>

## Add Further Submission Point

**Related original Submitter \***

**Related submission point \***

**FS support oppose**

**Reasons**

**Decision sought**

**Decision requested \***

Please enter your details below:

**1. Details of further submitter:**

<b>* Submitter Name:</b> Full name, or Name of Organisation / Company	Stormwater360
<b>Contact person for submission:</b> (If different to above)	Julia Watson
<b>Telephone no:</b> (Not required)	Optional
<b>* Address for service:</b> (Email, or physical address) Please note, an email address is the preferred method	<a href="mailto:juliaw@stormwater360.co.nz">juliaw@stormwater360.co.nz</a>
<b>* I wish to be heard in support of my submission at a hearing</b>	Yes
<b>* I would consider presenting a joint case at the hearing with others who make a similar submission</b>	Yes


**2. Criteria applicable to Further Submitter:**

<b>* Only certain people may make further submissions Please</b>	
<b>A) I am a person representing a relevant aspect of the public interest; or</b>	No
<b>B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or</b>	Yes
<b>C) I am the local authority for the relevant area.</b>	No
<b>* Specify the reasoning behind why you qualify for either of these above options:</b>	Stormwater360 has 29 years of experience in stormwater treatment and regulation across the globe. We were a part of the Urban Water Working Group providing recommendations to Central Government as well as many local policy and regulation guidelines in other countries. We believe this experience is valuable to New Zealand.

**3. For the further submitter to action**

Service of your further submission:  
Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**  
Each submitter has an address for service available at:  
[NRP PC1 Address for Service](#)  
If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

**4. Disclosures:**

If providing a submission on behalf of a company / organisation <b>I confirm that I have authority to do so:</b>	
<b>Date:</b>	5/04/2024
Public information: Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the below: <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement.</a>	
You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a> .	

**5. Further Submission:**

• The original submissions received have been summarised into submission points and collated into one summary table.  
This document(s) is a Summary of Decisions Requested:  
[NRP PC 1 - Summary of Decisions Requested – By Submitter](#)  
[NRP PC 1 - Summary of Decisions Requested –By Provision](#)

• Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.

• If you are providing suggested text amendments to a provision, please do so in the following format:

- Suggested added text, shown as **bolded text** format  
- Suggested deleted text, shown as ~~strikethrough~~ format

Please enter your Further Submission in the next worksheet. All of the original submitters and their associated submission points on the proposed change have been included so please place your comments in the corresponding cells.

If you have questions on how to use this submission form please email one of our friendly team at [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)



Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Filter original submission point by the chapter location	Filter original submission point by specific provision title	Filter by the original submitter Name and associated Submitter Number	Unique identifying number allocated to each specific submission point	Support Oppose Support in part Oppose in part Not stated	Allow Disallow Allow in part Disallow in part	Illustrate which aspects of this original submission that you support or oppose.  Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.	Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
General comments	<b>General comments - stormwater management</b>	S151 - Wellington Water Ltd	S151.001	Support	Allow	<b>S151.184:</b> Provide flexibility and a feasible method for determining target load reductions. Justification for Schedule 28 Target Load Reduction and calculations should also be provided.	Support based on our comments already submitted upon Schedule 28 and a lack of technical evidence for the 90% Target Load reduction for copper and zinc in stormwater
General comments	<b>General comments - stormwater management</b>	S151 - Wellington Water Ltd	S151.001	Support	Allow	<b>S151.185:</b> Support comments. Stormwater (and wastewater) discharges should remain a restricted discretionary activity and PC1 should act as a 'one stop shop'	Support amend rules to ensure restricted discretionary remains.
General comments	<b>General comments - stormwater management</b>	S151 - Wellington Water Ltd	S151.001	Support	Allow	<b>S151.186:</b> Support that GWRC should model the state of the environment and that contaminant loading is the important factor in aiming to meet concentration levels. Support the use of Medusa and Contaminant Load Models.	Support contaminant loading and that modelling of concentration is removed based on feasibility.
General comments	<b>General comments - stormwater management</b>	S151 - Wellington Water Ltd	S151.001	Support	Allow	<b>S151.188:</b> Support more clarity on the approach to managing groundwater and that other than for WWTP discharges should be managed by capping and minimising loads so that loads do not increase over time.	Minimising loads through any practicable means is important and rules should be clear to avoid any groundwater contamination. Once groundwater is affected we can't do anything about it.
General comments	General comments - stormwater management	S177 - Transpower New Zealand Limited	S177.013	Oppose	Disallow	Do not support removal of the term 'minor'. Suggest definition of 'minor' is provided in terms of surface area or similar to address the clarity sought. Resurfacing and redevelopment of existing impervious surfaces for the purpose of operating, upgrading and maintaining the National Grid should not be excluded from the rule.	SW discharges from the National Grid have adverse effects on the environment in terms of contaminants in runoff (references will be provided), therefore resurfacing and redevelopment of existing impervious surfaces for the purpose of operating, upgrading and maintaining the National Grid should not be excluded from the rule. Maintenance and repair of surfaces is the best time to retrofit upgrades to stormwater infrastructure, hence should be included outside of those areas defined as 'minor'. Moreover, maintenance or repair of surfaces can affect surface flow rates and therefore should be considered.

Chapter 8	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	S177 - Transpower New Zealand Limited	S177.021	Oppose	Disallow	Suggest the term <b>contaminants</b> is kept - not replaced and that a hydrocarbon effluent concentration is required. <b>Amend policy as follows:</b> Policy WH.P11: Discharges of contaminants hazardous substances in stormwater from high risk industrial or trade premises The discharge of stormwater to water, including discharges via the stormwater network, from a high risk industrial or trade premise shall be managed by: (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding contaminants or hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and (c) installing an interceptor that <b>reduces effluent concentration to less than 5mg/L of hydrocarbons</b> where there is a risk of petroleum hydrocarbons entering into the stormwater network, a surface water body or coastal water, and (d) avoiding or mitigating adverse effects of stormwater discharges on groundwater quality	Contaminants should be used to include zinc, copper, phosphorus etc - not just specific to hazardous substances. Less than 5mg/l is the EU standard for hydrocarbon effluent, therefore suggest a standard written in to NZ legislation.
Chapter 8	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	S177 - Transpower New Zealand Limited	S177.031	Oppose	Disallow	Oppose removing existing from PC1 on that basis that existing sites need to be included to gain improvements on the current state and reach TAS outlined in PC1.	References will be provided in evidence for the hearing. Contaminants should remain considered and as separate from hazardous substances.
Chapter 8	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	S177 - Transpower New Zealand Limited	S177.032	Oppose	Disallow	Suggest High risk industrial and trade premises should remain excluded on the basis of potentially high contaminant loading. Disagree with effluent level proposed and suggests hydrocarbon effluent concentration should be less than 5mg/L , and should be included under Policy WH.P11	For high risk industrial sites URQIS data shows 25% of samples from untreated sites were over 100mg/l, hence the sites should be treated and no development on such sites should be a permitted activity. Less than 5mg/l is the EU standard for hydrocarbon effluent. References will be provided in evidence for the hearing
Chapter 8	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	S177 - Transpower New Zealand Limited	S177.034	Oppose in part	Disallow in part	Suggest High risk industrial and trade premises should remain excluded on the basis of potentially high contaminant loading. Disagree with effluent level proposed and suggests hydrocarbon effluent concentration should be less than 5mg/L , and should be included under Policy WH.P11	For high risk industrial sites URQIS data shows 25% of samples from untreated sites were over 100mg/l, hence the sites should be treated and no development on such sites should be a permitted activity. Less than 5mg/l is the EU standard for hydrocarbon effluent. References will be provided in evidence for the hearing
Chapter 8	Rule WH.R12: All other stormwater discharges – non-complying activity.	S177 - Transpower New Zealand Limited	S177.035	Oppose	Disallow	Suggest financial contributions remain on the basis of funding required for stormwater infrastructure upgrades.	Stormwater is underfunded over the years and needs an income source to gain any improvements and reach TAS.
Chapter 9	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	S177 - Transpower New Zealand Limited	S177.047	Oppose	Disallow	Suggest policy stays on the basis that entrainment of contaminants should too be avoided.	The policy notes where avoidance is not practicable that good management practice should be used, which is achievable.

Chapter 9	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	S177 - Transpower New Zealand Limited	S177.059	Oppose	Disallow	Suggest High risk industrial and trade premises should remain excluded on the basis of potentially high contaminant loading. Disagree with effluent level proposed and suggests hydrocarbon effluent concentration should be less than 5mg/L , and should be included under Policy WH.P11	For high risk industrial sites URQIS data shows 25% of samples from untreated sites were over 100mg/l, hence the sites should be treated and no development on such sites should be a permitted activity. Less than 5mg/l is the EU standard for hydrocarbon effluent. References will be provided in evidence for the hearing
Chapter 9	Rule P.R10: Stormwater from new and redeveloped impervious surfaces–discretionary activity.	S177 - Transpower New Zealand Limited	S177.061	Oppose	Disallow	Suggest financial contributions remain on the basis of funding required for stormwater infrastructure upgrades.	Stormwater is underfunded over the years and needs an income source to gain any improvements and reach freshwater TAS.
Chapter 12	Schedule 28: Stormwater Contaminant Treatment.	S177 - Transpower New Zealand Limited	S177.070	Support	Allow	Further suggest phosphorus and nitrogen should be included in Schedule 28 on the basis they are measured in TAS	
Chapter 12	Schedule 29: Stormwater Impact Assessments.	S177 - Transpower New Zealand Limited	S177.071	Oppose in part	Disallow in part	Oppose on the basis that alternative materials to existing can alter flow rates and volumes. Contaminants should also remain.	

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**Form 6: Further submission in support of, or in opposition to,  
submission on notified proposed policy statement or plan, change or  
variation**

*Pursuant to clause 8 of the First Schedule of the Resource Management Act 1991*

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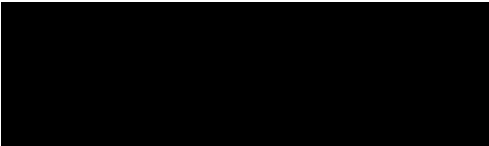
**To:** Greater Wellington Regional Council (**the Council**)

**Name of submitter:** Tama Potaka, Minister of Conservation

1. This is a further submission in support of (or in opposition to) a submission on the proposed Plan Change 1 to the following:

**Natural Resources Plan for the Wellington Region**

2. I have outlined my views on specific submissions in a table on the **attached** table in the required format.
3. I wish to be heard in support of my further submission.
4. If others make a similar submission, I will consider presenting a joint case with them at a hearing.
5. A copy of this submission has been served on the original submitters.




Alice Heather  
Director, Operations  
Lower North Island  
Department of Conservation  
Acting pursuant to delegated authority on behalf of Tama Potaka, Minister of Conservation

Date: 5 March 2024

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

**Address for service:**

aching@doc.govt.nz  
Attn: Amelia Ching, Planner  
Telephone:   
Department of Conservation

I support (or oppose) the submission of:	The particular parts of the submission I support (or oppose) are:	The reasons for my support (or opposition) are:	I seek that the whole (or part) of the submission be allowed (or disallowed):
Tracy Simms	S175.001	The submission point seeks to withdraw Plan Change 1 (PC1). The Whaitua processes and inclusion of FMU-specific freshwater visions, attributes and environmental outcomes are appropriate to give effect to the National Policy Statement for Freshwater Management 2020 (NPS-FM 2020) and the Greater Wellington Regional Policy Statement 2013 (GWRPS) and to have regard to the proposed Plan Change 1 to the GWRPS. MOC supports the Whaitua processes and the Whaitua statements being implemented in PC1.	disallow
Yvonne Weeber	S183.001, S183.002, S183.003.	The submission points support all the provisions of PC1. MOC also supports the direction of PC1 and the inclusion of FMU-specific freshwater visions, attributes and environmental outcomes are appropriate to give effect to the NPS-FM 2020 and GWRPS and to have regard to the proposed Plan Change 1 to the GWRPS.	allow

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Transpower New Zealand Limited
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	Environment.Policy@transpower.co.nz
Phone: (Optional)	
Contact person for submission: (If different to above)	Rebecca Eng
I wish to be heard in support of my submission at a hearing:	Yes

I would consider presenting a joint case at the hearing with others who make a similar submission:	No
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	No
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Transpower is potentially affected by the content of the submissions that it is submitting on.

<b>3. For the further submitter to action</b>
<p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	Signature	8 March 2024
<p><b>Public information:</b></p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.</p> <p>You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>• The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>• Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>• If you are providing suggested text amendments to a provision, please do so in the following format: <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>struckthrough</del> format</li> </ul> </li> </ul>

Please enter further submission points in the table on the following page(s)

#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<b>*Submitter name or, Submitter number of the submission you are commenting on:</b>	<b>*Submission point number:</b> <i>Unique identifying number allocated to each specific <u>submission point</u>, located in the second column of the summary of decisions requested table:</i>	<b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i>	<b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i>	<b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose.</i>  <i>Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	<b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
<b>S041 (Chorus New Zealand Limited and others)</b>					
S041 (Chorus New Zealand Limited and others)	S41.004	Support in part	Allow in part	Transpower supports excluding “thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance” from earthworks rule WH.R23.	Transpower considers the exclusions sought for cable laying and pipe maintenance better recognises and provides for cable or pipe laying that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.
S041 (Chorus New Zealand Limited and others)	S41.008	Support in part	Allow in part	Transpower supports excluding “thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance” from earthworks rule P.R22.	Transpower considers the exclusions sought for cable laying and pipe maintenance better recognises and provides for cable or pipe laying that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.
<b>S222 (Environmental Defence Society Inc.)</b>					
S222 (Environmental Defence Society Inc.)	S222.023	Oppose in part	Disallow in part	Transpower opposes the request to include reference to natural form and character in objective WH.O2.	Refer to Transpower’s submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable



					objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S222.032	Oppose	Disallow	Transpower opposes the request to include reference to natural form and character in objective WH.O9.	Refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S222.033	Oppose in part	Disallow in part	Transpower opposes the request to include target attribute states for natural form and character in table 8.4 (or any added table).	Refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S222.034	Oppose in part	Disallow in part	Transpower opposes the request to include "restoring... natural form and character" in policy WH.P1.	Refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S222.057	Oppose	Disallow	Transpower opposes the request to change activity status of rule WH.R17 from permitted to controlled.	Refer to Transpower's submission on rule WH.R17. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid.

					However, if the decision requested by Transpower in its submission on rule WH.R17 is allowed, then Transpower would adopt a neutral position on this submission point.
S222 (Environmental Defence Society Inc.)	S222.058	Oppose	Disallow	Transpower opposes the request to change activity status of rule WH.R18 from controlled to discretionary or restricted discretionary.	Refer to Transpower's submission on rule WH.R17. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid, where this breaches the standards in rule WH.R17. However, if the decision requested by Transpower in its submission on rule WH.R17 is allowed, then Transpower would adopt a neutral position on this submission point.
S222 (Environmental Defence Society Inc.)	S222.063	Oppose in part	Disallow in part	Transpower opposes the request to increase the setback of earthworks from waterbodies and the coastal marine area under rule WH.R23.	The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.
S222 (Environmental Defence Society Inc.)	S022.064	Oppose in part	Disallow in part	Transpower opposes the request to change the activity status of earthworks rule WH.R24 from restricted discretionary to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R24 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.
S222 (Environmental Defence Society Inc.)	S022.076	Oppose in part	Disallow in part	Transpower opposes the request to include reference to natural form and character in objective P.O2.	Refer to Transpower's submission on objective P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is

					located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S022.079	Oppose in part	Disallow in part	Transpower opposes the request to include target attribute states for natural form and character in table 9.2 (or any added table).	Refer to Transpower's submission on objective P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S022.080	Oppose in part	Disallow in part	Transpower opposes the request to include "restoring... natural form and character" in policy P.P1.	Refer to Transpower's submission on objective P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S222 (Environmental Defence Society Inc.)	S022.099	Oppose	Disallow	Transpower opposes the request to change activity status of rule P.R16 from permitted to controlled.	Refer to Transpower's submission on rule P.R16. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid. However, if the decision requested by Transpower in its submission on rule P.R16 is allowed, then Transpower would adopt a neutral position on this submission point.
S222 (Environmental Defence Society Inc.)	S022.100	Oppose	Disallow	Transpower opposes the request to change activity status of rule P.R17 from controlled to discretionary or restricted discretionary.	Refer to Transpower's submission on rule P.R16. The decision requested does not provide for vegetation clearance for the purpose of maintaining or operating the National Grid, where this breaches the standards in rule P.R16.

					However, if the decision requested by Transpower in its submission on rule P.R16 is allowed, then Transpower would adopt a neutral position on this submission point.
S222 (Environmental Defence Society Inc.)	S222.105	Oppose in part	Disallow in part	Transpower opposes the request to increase the setback of earthworks from waterbodies and the coastal marine area under rule P.R22.	The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.
S222 (Environmental Defence Society Inc.)	S222.106	Oppose in part	Disallow in part	Transpower opposes the request to change the activity status of earthworks rule P.R23 from restricted discretionary to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R24 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.
<b>S261 (Forest &amp; Bird)</b>					
S261 (Forest & Bird)	S261.002	Oppose in part	Disallow in part	Transpower opposes the request to include target attribute states for natural form and character.	Refer to Transpower's submission on objectives WH.O1 and P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S261 (Forest & Bird)	S261.049	Oppose in part	Disallow in part	Transpower opposes the request to include reference to ephemeral watercourses in objective WH.O1.	Transpower opposes references to ephemeral watercourses in objective WH.O1 on the basis that ephemeral watercourses are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that ephemeral watercourses

					only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the objective.
S261 (Forest & Bird)	S261.050	Oppose in part	Disallow in part	<p>Transpower opposes the request to include reference to ephemeral watercourses in objective WH.O2.</p> <p>Transpower also opposes the request to include reference to natural form and character in clause (a) of objective WH.O2.</p>	<p>Transpower opposes references to ephemeral watercourses in objective WH.O2 on the basis that ephemeral watercourses are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that ephemeral watercourses only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the objective.</p> <p>With respect to natural form and character, refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.060	Oppose in part	Disallow in part	<p>Transpower opposes the request to include reference to natural form and character in objective WH.O9.</p>	<p>Refer to Transpower's submission on objective WH.O1.</p> <p>The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.061	Oppose in part	Disallow in part	<p>Transpower opposes the request to include target attribute states for natural form and</p>	<p>Refer to Transpower's submission on objective WH.O1.</p>

				character in table 8.4 (or any added table).	The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S261 (Forest & Bird)	S261.062	Oppose in part	Disallow in part	Transpower opposes the request to include references to natural form and character in policy WH.P1.	Refer to Transpower's submission on objective WH.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S261 (Forest & Bird)	S261.063	Oppose in part	Disallow in part	<p>Transpower opposes the amendments requested to clause (a) of policy WH.P2.</p> <p>Transpower opposes the request to refer to ephemeral watercourses in clause (e) of policy WH.P2.</p> <p>Transpower opposes the request to include a new clause: "(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited".</p>	<p>With respect to the amendments requested to clause (a), Transpower opposes these on the basis that they are inconsistent with the decision requested by Transpower on clause (a).</p> <p>With respect of the amendments requested to clause (e), Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that they only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the policy.</p> <p>With respect to the new clause (i) requested, Transpower opposes this on the basis that the phrase "may lead to a decline in water</p>

					quality” is highly uncertain and potentially open-ended in terms of the range of land use activities that it may apply to.
S261 (Forest & Bird)	S261.073	Oppose	Disallow	Transpower opposes the request to amend policy WH.P11 to require resource consent for all discharges of stormwater from high risk industrial or trade premises.	Subject to its submissions on the rules for discharges from high risk industrial or trade premises, Transpower considers that it is reasonable to provide for these discharges as a permitted activity (subject to appropriate standards).
S261 (Forest & Bird)	S261.075	Oppose in part	Disallow in part	Transpower opposes the request to amend policy WH.P14 to replace the word “practicable” with “possible”.	Replacing “practicable” with “possible” sets an unreasonably high threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.
S261 (Forest & Bird)	S261.090	Oppose	Disallow	Transpower opposes the request to amend policy WH.P29 to increase setback distances for earthworks and refer to ephemeral watercourses.	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what justification there is for any increased setback (of no less than 10m)  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the policy.
S261 (Forest & Bird)	S261.099	Oppose in part	Disallow in part	Transpower opposes the request to amend the activity status of stormwater discharge rule WH.R5 from permitted to controlled.	Transpower considers that it would not be efficient or effective to require resource consent for all discharges from new or redeveloped impervious surfaces (no matter how minor).
S261 (Forest & Bird)	S261.100	Oppose in part	Disallow in part	Transpower opposes the request to amend the activity status of stormwater discharge rule WH.R6 from controlled to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R6 being allowed, Transpower considers that the matters of control recognise an appropriate

					range of potential adverse effects associated with stormwater from new greenfield impervious surfaces. On this basis, Transpower considers that discretionary activity status is unjustified.
S261 (Forest & Bird)	S261.110	Oppose in part	Disallow in part	Transpower opposes the request to amend vegetation clearance rule WH.R17 to include the following standard: “(x) the vegetation clearance is not undertaken within, or within 10 metre setback from, a surface water body, ephemeral watercourse, or the coastal marine area”.	Transpower opposes including a setback standard for vegetation clearance on the basis that the need for such a standard, is not clearly justified.  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.
S261 (Forest & Bird)	S261.111	Oppose	Disallow	Transpower opposes the request to reclassify vegetation clearance rule WH.R18 as a discretionary activity.  Transpower opposes the alternative request to include “adverse effects on the environment” as a matter of discretion.	Subject to the decision requested by Transpower in its submission on rule WH.R18 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with vegetation clearance. On this basis, Transpower considers that discretionary activity status is unjustified.  Transpower opposes the alternative request to include “adverse effects on the environment” as a matter of discretion, as this is an overly broad matter of discretion that effectively makes the activity a discretionary activity.
S261 (Forest & Bird)	S261.116	Oppose in part	Disallow in part	Transpower opposes the request to amend earthworks rule WH.R23 to increase the setback for earthworks from 5m to 10m.	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear



				Transpower opposes the request to amend earthworks rule WH.R23 to refer to ephemeral watercourses.	<p>what justification there is for any increased setback.</p> <p>With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.</p>
S261 (Forest & Bird)	S261.117	Oppose	Disallow	Transpower opposes the request to amend the activity status of earthworks rule WH.R24 from restricted discretionary to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R24 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.
S261 (Forest & Bird)	S261.133	Oppose in part	Disallow in part	Transpower opposes the request to include reference to ephemeral watercourses in objective P.O1.	Transpower opposes references to ephemeral watercourses in objective P.O1 on the basis that ephemeral watercourses are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that ephemeral watercourses only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the objective.
S261 (Forest & Bird)	S261.134	Oppose in part	Disallow in part	<p>Transpower opposes the request to include reference to ephemeral watercourses in objective P.O2.</p> <p>Transpower also opposes the request to include reference to natural form and character in clause (a) of objective P.O2.</p>	Transpower opposes references to ephemeral watercourses in objective P.O2 on the basis that ephemeral watercourses are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that ephemeral watercourses

					<p>only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the objective.</p> <p>With respect to natural form and character, refer to Transpower's submission on objective P.O1. The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.139	Oppose in part	Disallow in part	Transpower opposes the request to include reference to natural form and character in objective P.O6.	<p>Refer to Transpower's submission on objective P.O1.</p> <p>The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.140	Oppose in part	Disallow in part	Transpower opposes the request to include target attribute states for natural form and character in table 9.2 (or any added table).	<p>Refer to Transpower's submission on objective P.O1.</p> <p>The restoration of natural character in relation to all freshwater bodies and the coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.</p>
S261 (Forest & Bird)	S261.141	Oppose in part	Disallow in part	Transpower opposes the request to include references to natural form and character in policy P.P1.	<p>Refer to Transpower's submission on objective P.O1.</p> <p>The restoration of natural character in relation to all freshwater bodies and the coastal</p>

					marine area is not a reasonably achievable objective where existing regionally significant infrastructure (such as the National Grid) is located over or within freshwater bodies or the coastal marine area.
S261 (Forest & Bird)	S261.142	Oppose in part	Disallow in part	<p>Transpower opposes the amendments requested to clause (a) of policy P.P2.</p> <p>Transpower opposes the request to refer to ephemeral watercourses in clause (e) of policy P.P2.</p> <p>Transpower opposes the request to include a new clause: “(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited”.</p>	<p>With respect to the amendments requested to clause (a), Transpower opposes these on the basis that they are inconsistent with the decision requested by Transpower on clause (a).</p> <p>With respect of the amendments requested to clause (e), Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. Further, it is unclear how the health of ephemeral watercourses would be measured in practice given that they only convey or retain water during or immediately after rainfall events. This introduces significant uncertainty into the scope and spatial application of the policy.</p> <p>With respect to the new clause (i) requested, Transpower opposes this on the basis that the phrase “may lead to a decline in water quality” is highly uncertain and potentially open-ended in terms of the range of land use activities that it may apply to.</p>
S261 (Forest & Bird)	S261.152	Oppose	Disallow	Transpower opposes the request to amend policy P.P10 to replace the word “practicable” with “possible”.	Replacing “practicable” with “possible” sets an unreasonably high requirement for the management of various effects across the range of matters where the term “practicable” is referred to.
S261 (Forest & Bird)	S261.153	Oppose	Disallow	Transpower opposes the request to amend policy P.P11 to require resource consent	Subject to its submissions on the rules for discharges from high risk industrial or trade

				for all discharges of stormwater from high risk industrial or trade premises.	premises, Transpower considers that it is reasonable to provide for these discharges as a permitted activity (subject to appropriate standards).
S261 (Forest & Bird)	S261.155	Oppose in part	Disallow in part	Transpower opposes the request to amend policy P.P13 to replace the word “practicable” with “possible”.	Replacing “practicable” with “possible” sets an unreasonably high threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.
S261 (Forest & Bird)	S261.169	Oppose	Disallow	Transpower opposes the request to amend policy P.P27 to increase setback distances for earthworks and refer to ephemeral watercourses.	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what justification there is for any increased setback.  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the policy on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the policy.
S261 (Forest & Bird)	S261.176	Oppose in part	Disallow in part	Transpower opposes the request to amend the activity status of stormwater discharge rule P.R5 from permitted to controlled.	Transpower considers that it would not be efficient or effective to require resource consent for all discharges from new or redeveloped impervious surfaces (no matter how minor).
S261 (Forest & Bird)	S261.177	Oppose in part	Disallow in part	Transpower opposes the request to amend the activity status of stormwater discharge rule WH.R6 from controlled to discretionary.	Subject to the decision requested by Transpower in its submission on rule WH.R6 being allowed, Transpower considers that the matters of control recognise an appropriate range of potential adverse effects associated with stormwater from new greenfield impervious surfaces. On this basis, Transpower considers that discretionary activity status is unjustified.

S261 (Forest & Bird)	S261.178	Oppose	Disallow	Transpower opposes the request to amend the activity status of stormwater discharge rule P.R7 from controlled to restricted discretionary.	Transpower considers that controlled activity status provides sufficient ability to impose conditions on consents to manage the potential adverse effects of stormwater runoff from new and redeveloped impervious surfaces in existing urban areas.
S261 (Forest & Bird)	S261.187	Oppose in part	Disallow in part	Transpower opposes the request to amend vegetation clearance rule P.R16 to include the following standard: “(x) the vegetation clearance is not undertaken within, or within 10 metre setback from, a surface water body, ephemeral watercourse, or the coastal marine area”.	Transpower opposes including a setback standard for vegetation clearance on the basis that the need for such a standard, is not clearly justified.  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.
S261 (Forest & Bird)	S261.188	Oppose	Disallow	Transpower opposes the request to reclassify vegetation clearance rule P.R17 as a discretionary activity.  Transpower opposes the alternative request to include “adverse effects on the environment” as a matter of discretion.	Subject to the decision requested by Transpower in its submission on rule P.R17 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with vegetation clearance. On this basis, Transpower considers that discretionary activity status is unjustified.  Transpower opposes the alternative request to include “adverse effects on the environment” as a matter of discretion, as this is an overly broad matter of discretion that effectively makes the activity a discretionary activity.
S261 (Forest & Bird)	S261.193	Oppose in part	Disallow in part	Transpower opposes the request to amend earthworks rule P.R22 to increase the setback for earthworks from 5m to 10m.	With respect to the setback requested, the setback provided in the notified plan change is consistent with the setback for earthworks

				Transpower opposes the request to amend earthworks rule P.R22 to refer to ephemeral watercourses.	provided for in the operative NRP. It is unclear what justification there is for any increased setback.  With respect to ephemeral watercourses, Transpower opposes references to ephemeral watercourses in the rule on the basis that they are typically not mapped and, in practice, difficult to clearly define. This introduces significant uncertainty into the scope and spatial application of the rule.
S261 (Forest & Bird)	S261.194	Oppose	Disallow	Transpower opposes the request to amend the activity status of earthworks rule P.R23 from restricted discretionary to discretionary.	Subject to the decision requested by Transpower in its submission on rule P.R23 being allowed, Transpower considers that the matters of discretion recognise an appropriate range of potential adverse effects associated with earthworks. On this basis, Transpower considers that discretionary activity status is unjustified.
<b>S238 (Greater Wellington Regional Council)</b>					
S238 (Greater Wellington Regional Council)	S238.002	Support in part	Allow in part	Transpower considers that if a definition of “urban zones” is to be included in the Plan, that the definition must also include the following text at the end: “open space zones and sport and active recreation zones that adjoin the zones listed above”.	Open space zones and sport and active recreation zones that adjoin other urban zones are a contiguous part of the urban environment, and this should be recognised in the definition.  While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports a review of the maps should the rules and associated maps be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support

					structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could prohibit the upgrading or development of the National Grid in these areas.
<b>S211 (Hutt City Council)</b>					
S211 (Hutt City Council)	S211.023	Support	Allow	Transpower supports the request to add the following exclusion to earthworks rule WH.R23: “Note: this rule excludes repair or maintenance of existing roads, or repair, sealing or resealing of a road, footpath or driveway.”	Transpower considers that the exclusion would appropriately enable maintenance and repair of roads, footpaths, or driveways that provide access to regionally significant infrastructure (including the National Grid).
<b>S257 (Kāinga Ora)</b>					
S257 (Kāinga Ora)	S257.004	Support	Allow	Transpower supports the request to amend the definition of hydrological control (and/or associated rules) to provide greater clarity as to what constitutes a hydrological control.	Transpower considers that greater clarity as to what constitutes hydrological control (for example, by setting out acceptable/permitted technical solutions within the Plan) will provide greater certainty and efficiency for plan users and the Council, as it would reduce the need for specific engineering design (particularly for the development/redevelopment of smaller impervious surfaces).
S257 (Kāinga Ora)	S257.005	Support in part	Allow in part	Transpower supports the request to amend the text of policy WH.P14 (stormwater discharges from new and redeveloped impervious surfaces) so that it has a greater “policy focus”.	The policy is currently constructed as if it were a set of standards in a rule. Transpower supports redrafting the policy so that it has a clearer focus on the effects sought to be managed by the standards in the rules associated with impervious surfaces, rather than simply repeating those standards.
S257 (Kāinga Ora)	S257.028	Support in	Allow in part	Transpower supports the request to	Transpower considers that increasing the

Ora)		part		amend rule WH.R5 to increase the permitted activity impervious surface threshold from 1,000m <sup>2</sup> to at least 5,000m <sup>2</sup> , and to clarify that the threshold applies only to new/additional areas of impervious surface.	threshold and clarifying that it applies only to new/additional impervious surface, would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.029	Support in part	Allow in part	Transpower supports the request the amend rule WH.R6 to increase the controlled activity impervious surface threshold for new greenfield impervious surfaces from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .	Transpower considers that increasing the threshold would better provide for the development of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.030	Support in part	Allow in part	Transpower supports the request the amend rule WH.R7 to increase the controlled activity impervious surface threshold for new or redeveloped impervious surfaces in existing urban areas from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .	Transpower considers that increasing the threshold would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.031	Support in part	Allow in part	<p>Transpower supports the request the amend rule WH.R11 to increase the discretionary activity impervious surface threshold for new or redeveloped impervious surfaces from 3,000m<sup>2</sup> to at least 5,000m<sup>2</sup>.</p> <p>Transpower supports the request to amend the activity status of rule WH.R11 from discretionary to restricted discretionary.</p>	<p>Transpower considers that increasing the threshold would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).</p> <p>With respect to the request to change the activity status of the rule from discretionary to restricted discretionary, Transpower supports this subject to the rule including a matter of discretion that recognises the benefits that the development or redevelopment of impervious surfaces has for the operation, maintenance, upgrading, or development of regionally significant infrastructure.</p>



S257 (Kāinga Ora)	S257.035	Support	Allow	Transpower supports the request to amend rule WH.R18 (and consequently WH.R17) to increase the threshold of vegetation clearance before consent is required as a controlled activity.	The submission is in general alignment with Transpower's submission on rule WH.R17.
S257 (Kāinga Ora)	S257.036	Support	Allow	<p>Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule WH.R23.</p> <p>Transpower supports the request to delete clause (c)(iv) from rule WH.R23.</p>	<p>Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.</p> <p>With respect to the request to delete clause (c)(iv) from rule WH.R23, this request is consistent with the decision requested by Transpower in its submission.</p>
S257 (Kāinga Ora)	S257.037	Support	Allow	<p>Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule WH.R24.</p> <p>Transpower supports the request to delete clause (b) (which relates to the winter shut-down of earthworks) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.</p>	<p>Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.</p> <p>With respect to the request to delete clause (b) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule, this request is general consistent with the decisions requested by Transpower in its submission.</p>
S257 (Kāinga Ora)	S257.038	Support	Allow	Transpower supports the request to delete earthworks rule WH.R25 (non-complying activity rule for earthworks), and instead provide for the consideration of winter earthworks as a matter of discretion under the relevant restricted discretionary	This request is general consistent with the decisions requested by Transpower in its submission.

				activity rule.	
S257 (Kāinga Ora)	S257.056	Support in part	Allow in part	Transpower supports the request to amend rule P.R5 to increase the permitted activity impervious surface threshold from 1,000m <sup>2</sup> to at least 5,000m <sup>2</sup> , and to clarify that the threshold applies only to new/additional areas of impervious surface.	Transpower considers that increasing the threshold and clarifying that it applies only to new/additional impervious surface, would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.057	Support in part	Allow in part	Transpower supports the request the amend rule P.R6 to increase the controlled activity impervious surface threshold for new greenfield impervious surfaces from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .	Transpower considers that increasing the threshold would better provide for the development of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.058	Support in part	Allow in part	Transpower supports the request the amend rule P.R7 to increase the controlled activity impervious surface threshold for new or redeveloped impervious surfaces in existing urban areas from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .	Transpower considers that increasing the threshold would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).
S257 (Kāinga Ora)	S257.059	Support in part	Allow in part	Transpower supports the request the amend rule P.R10 to increase the discretionary activity impervious surface threshold for new or redeveloped impervious surfaces from 3,000m <sup>2</sup> to at least 5,000m <sup>2</sup> .  Transpower supports the request to amend the activity status of rule P.R10 from discretionary to restricted discretionary.	Transpower considers that increasing the threshold would better provide for the development or redevelopment of impervious surfaces that support, provide access to, or are otherwise a part of regionally significant infrastructure (including the National Grid).  With respect to the request to change the activity status of the rule from discretionary to restricted discretionary, Transpower supports this subject to the rule including a matter of

					discretion that recognises the benefits that the development or redevelopment of impervious surfaces has for the operation, maintenance, upgrading, or development of regionally significant infrastructure.
S257 (Kāinga Ora)	S257.063	Support	Allow	Transpower supports the request to amend rule P.R17 (and consequently P.R16) to increase the threshold of vegetation clearance before consent is required as a controlled activity.	The submission is in general alignment with Transpower's submission on rule P.R16.
S257 (Kāinga Ora)	S257.064	Support	Allow	<p>Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule P.R22.</p> <p>Transpower supports the request to delete clause (c)(iv) from rule P.R22.</p>	<p>Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.</p> <p>With respect to the request to delete clause (c)(iv) from rule P.R22, this request is consistent with the decision requested by Transpower in its submission.</p>
S257 (Kāinga Ora)	S257.065	Support	Allow	<p>Transpower supports the request to exempt activities associated with the trenching of services from earthworks rule P.R23.</p> <p>Transpower supports the request to delete clause (b) (which relates to the winter shut-down of earthworks) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.</p>	<p>Transpower considers the exemptions sought for trenching of services better recognises and provides for trenching of services that may be associated with the maintenance, upgrading, or development of regionally significant infrastructure.</p> <p>With respect to the request to delete clause (b) and provide for winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule, this request is general consistent with the decisions requested by Transpower in its submission.</p>

S257 (Kāinga Ora)	S257.066	Support	Allow	Transpower supports the request to delete earthworks rule P.R24 (non-complying activity rule for earthworks), and instead provide for the consideration of winter earthworks as a matter of discretion under the relevant restricted discretionary activity rule.	This request is general consistent with the decisions requested by Transpower in its submission.
S257 (Kāinga Ora)	S257.068	Support in part	Allow in part	Should maps 86, 87, 88, and 89 (unplanned greenfield development areas) be retained, Transpower supports the request to review these maps, and to exclude land zoned as open space from “unplanned greenfield areas”, where these are located within or adjacent to an urban environment.	While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports are review of the maps should the rules and associated maps be retained be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could prohibit the upgrading or development of the National Grid in these areas.
S257 (Kāinga Ora)	S257.069	Support in part	Allow in part	Should maps 86, 87, 88, and 89 (unplanned greenfield development areas) be retained, Transpower supports the request to review these maps, and to exclude land zoned as open space from “unplanned greenfield areas”, where these are located within or adjacent to an urban environment.	While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports are review of the maps should the rules and associated maps be retained be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could

					prohibit the upgrading or development of the National Grid in these areas.
S257 (Kāinga Ora)	S257.070	Support in part	Allow in part	Should maps 86, 87, 88, and 89 (unplanned greenfield development areas) be retained, Transpower supports the request to review these maps, and to exclude land zoned as open space from “unplanned greenfield areas”, where these are located within or adjacent to an urban environment.	While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports are review of the maps should the rules and associated maps be retained be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could prohibit the upgrading or development of the National Grid in these areas.
S257 (Kāinga Ora)	S257.071	Support in part	Allow in part	Should maps 86, 87, 88, and 89 (unplanned greenfield development areas) be retained, Transpower supports the request to review these maps, and to exclude land zoned as open space from “unplanned greenfield areas”, where these are located within or adjacent to an urban environment.	While Transpower’s submission seeks that the National Grid is excluded from the rules associated with unplanned greenfield development, or alternatively that these rules are deleted, Transpower also supports are review of the maps should the rules and associated maps be retained be retained. Several National Grid assets (including substations, National Grid lines, and National Grid support structures) are located within open space zones identified in the maps as “unplanned greenfield development areas”. As a consequence, the rules associated with unplanned greenfield development could prohibit the upgrading or development of the National Grid in these areas.

S257 (Kāinga Ora)	S257.073	Oppose	Disallow	Transpower opposes the request to delete maps 91 and 94 (highest erosion risk land (woody vegetation)) and replacing these with a definition for “high and highest risk erosion land”.	Transpower considers that a mapped approach (subject to Transpower’s submissions on maps 91 and 94) provides more certainty than a definition. Depending on how any definition is framed, it may be subject to a broad range of interpretations, which could reduce certainty of interpretation for plan users and Council officers when identifying areas subject to the relevant vegetation clearance rules.
S257 (Kāinga Ora)	S257.076	Oppose	Disallow	Transpower opposes the request to delete maps 91 and 94 (highest erosion risk land (woody vegetation)) and replacing these with a definition for “high and highest risk erosion land”.	Transpower considers that a mapped approach (subject to Transpower’s submissions on maps 91 and 94) provides more certainty than a definition. Depending on how any definition is framed, it may be subject to a broad range of interpretations, which could reduce certainty of interpretation for plan users and Council officers when identifying areas subject to the relevant vegetation clearance rules.
<b>S286 (Taranaki Whānui)</b>					
S286 (Taranaki Whānui)	S286.041	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
S286 (Taranaki Whānui)	S286.045	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users

					by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
S286 (Taranaki Whānui)	S286.069	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
S286 (Taranaki Whānui)	S286.070	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
S286 (Taranaki Whānui)	S286.071	Support	Allow	Transpower supports the request to develop a more comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions.	Transpower considers that a comprehensive framework for hydrological control and water sensitive urban design measures, including acceptable technical solutions, will provide greater certainty and efficiency for plan users by reducing the need for plan users to rely on specific engineering design in order to provide effective hydrological control and water sensitive urban design measures.
<b>S275 (The New Zealand Transport Agency)</b>					
S275 (The New Zealand Transport)	S275.003	Support	Allow	Transpower supports the request to provide for the exclusions (as set out under clause (d) of the operative definition of	The decision requested is consistent with the decisions requested in Transpower's submission on the definition of "earthworks".

Agency)				“earthworks”) to enable construction, repair, upgrade or maintenance of infrastructure.	
<b>S33 (Wellington City Council)</b>					
S33 (Wellington City Council)	S33.010	Support	Allow	Transpower supports the request to clarify scale or metric thresholds where activities would be regulated under the definition of “high risk industrial or trade premise”.	Subject to detail, Transpower supports appropriate scale or metric thresholds as part of the definition of “high risk industrial or trade premise” as this could provide greater certainty to plan users as to the scale and scope of activities that are covered by the definition.
<b>S151 (Wellington Water Ltd)</b>					
S151 (Wellington Water Ltd)	S151.005	Support	Allow	Transpower supports the request to exempt regionally significant infrastructure from the winter shutdown for earthworks.	The request is generally consistent with Transpower’s submissions on the provisions associated with earthworks.
S151 (Wellington Water Ltd)	S151.018	Support	Allow	Transpower supports the request to retain the operative definition of “earthworks” (and delete the proposed definition of “earthworks”).	The request is generally consistent with Transpower’s submissions on the definition of “earthworks”. Specifically, this request would enable the exemptions for regionally significant infrastructure under clause (d) of the operative definition to continue to apply.
S151 (Wellington Water Ltd)	S151.089	Support	Allow	Should the winter shut down of earthworks set out in policy WH.P31 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from the policy.	The request is generally consistent with Transpower’s submissions on policy WH.P31.
S151 (Wellington Water Ltd)	S151.099	Support	Allow	Transpower supports the request to reinstate exemptions for certain earthworks activities under rule WH.R23, including for the thrusting, boring, trenching, or mole ploughing associated with cable or pipe laying and maintenance,	Transpower considers the exemptions sought to earthworks rule WH.R23 better recognise and provide for the maintenance, upgrading, or development of regionally significant infrastructure.



				and for the construction, repair, upgrade or maintenance of pipelines.	
S151 (Wellington Water Ltd)	S151.100	Support	Allow	Should the winter shut down of earthworks set out in rule WH.R24 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from clause (b) of the rule.	While Transpower has sought that clause (b) of the rule is deleted, as an alternative, Transpower would support an exemption from clause (b) for regionally significant infrastructure, as providing for such an exemption would appropriately recognise and provide for earthworks associated with the maintenance, upgrading, and development of regionally significant infrastructure.
S151 (Wellington Water Ltd)	S151.122	Support	Allow	Should the winter shut down of earthworks set out in policy P.P29 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from the policy.	The request is generally consistent with Transpower's submissions on policy P.P29.
S151 (Wellington Water Ltd)	S151.130	Support	Allow	Transpower supports the request to reinstate exemptions for certain earthworks activities under rule P.R22, including for the thrusting, boring, trenching, or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines.	Transpower considers the exemptions sought to earthworks rule P.R22 better recognise and provide for the maintenance, upgrading, or development of regionally significant infrastructure.
S151 (Wellington Water Ltd)	S151.131	Support	Allow	Should the winter shut down of earthworks set out in rule P.R23 be retained, Transpower supports the request to provide an exemption for regionally significant infrastructure from clause (b) of the rule.	While Transpower has sought that clause (b) of the rule is deleted, as an alternative, Transpower would support an exemption from clause (b) for regionally significant infrastructure, as providing for such an exemption would appropriately recognise and provide for earthworks associated with the maintenance, upgrading, and development of regionally significant infrastructure.

<p>S151 (Wellington Water Ltd)</p>	<p>S151.183</p>	<p>Support in part</p>	<p>Allow in part</p>	<p>Transpower supports the requested amendment to existing objective O9: “The social, economic, cultural and environmental benefits of Regionally Significant Infrastructure, renewable energy generation activities and the utilisation of mineral resources are <u>recognized and provided for.</u>”</p>	<p>Transpower supports the requested amendment to objective O9 as it would ensure that the benefits of regionally significant infrastructure (including the National Grid) are provided for through decision-making. This gives effect to policy 1 of the NPSET.</p>
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# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.


## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Urban Edge Planning Ltd on behalf of Coronation Real Estate Ltd
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	Corinna@urbanedgeplanning.co.nz
Phone: (Optional)	
Contact person for submission: (If different to above)	Corinna Tessendorf
I wish to be heard in support of my submission at a hearing:	Yes

I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	No
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Owner of a property incorrectly identified as unplanned greenfield area and initial submitter

<b>3. For the further submitter to action</b>
<p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		28/02/2024
<p><b>Public information:</b></p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.</p> <p>You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>• The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>• Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>• If you are providing suggested text amendments to a provision, please do so in the following format: <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul> </li> </ul>

Please enter further submission points in the table on the following page(s)

## 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

<p><b>*Submitter name or, Submitter number of the submission you are commenting on:</b></p>	<p><b>*Submission point number:</b> <i>Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:</i></p>	<p><b>*Stance on the submission point:</b> <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i></p>	<p><b>*Decision sought:</b> <i>(Allow, Disallow, Allow in part, or Disallow in part)</i></p>	<p><b>Decision sought</b> <i>Illustrate which aspects of this original submission that you support or oppose. Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i></p>	<p><b>Reasons:</b> <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i></p>
<p>S97  Urban Edge Planning Ltd on behalf of Coronation Real Estate Ltd</p>	<p>S97.004</p>	<p>Support</p>	<p>Allow</p>	<p>Support the entire submission point</p>	<p>The initial submission requests the removal of the unplanned greenfield area overlay from the site at 9 Comber Place since this was based on the incorrect zoning of the entire site as Natural Open Space Zone under the WCC Proposed District Plan.</p> <p>Wellington City Council has now released the s42A report which recommends the correction of this error and the rezoning of part of the site to Medium Density Residential.</p> <p>Attached is an extract of the relevant sections of the officer's report in relation to the site at 9 Comber Place.</p> <p>The full <a href="#">s42A report</a> can be found on WCC's <a href="#">website</a>.</p>

## 9 Comber Place – Recommended Decision – Extract

### 3.3 General Submissions – Open Space and Recreation Zones

#### *Matters raised by submitters*

##### *Rezoning / site specific*

87. *Coronation Real Estate Ltd [62.1 and 62.5] advises that significant investment in the development of the site has occurred and is currently subject to existing resource consents, a pending resource consent and an existing building consent relating to development on the residentially zoned (northern) part of the site, and consequently seeks that the entirety of the site at 9 Comber Place is rezoned to MRZ.*
88. *WCC [266.47, opposed by Panorama Property Limited [FS11.41]] considers that part of 9 Comber Place, Johnsonville to the east of the Ridgelines and Hilltops Overlay should be re-zoned from NOSZ to MRZ to correct a mapping error. They advise that the relief sought would better reflect the zoning of the ODP.*

#### *Assessment*

##### *Site specific rezoning*

119. *Before addressing the specific submission points that seek a change in zone, to assist the Panel I have briefly outlined the approach I have taken in assessing these requests to ensure a consistent approach has been applied.*
120. *Although not clear in the s32 Evaluation Report for Open Space and Recreation zones, the general approach of the PDP has been to ‘rollover’ the ODP open space zoning by applying the National Planning Standards zone equivalent. However, I note that although this is generally the case this has not been strictly applied.*
121. *I also note that although the majority of open space and recreation zoned land is publicly owned, there are a number of situations where privately owned land has an open space or recreation zone applied to part of a site.*
122. *Submitters have raised the appropriateness of applying an open space zone to privately owned land, and in considering rezoning requests I considered that this is an appropriate starting point. In my opinion, the Environment Court’s decision on the Golf (2012) Limited v Thames-Coromandel District Council case provides helpful guidance in this respect. In simple terms, the Court found that it was not unlawful or necessarily inappropriate to apply an open space zone to privately owned land, but directed that certain matters were relevant in determining whether an open space zone was appropriate.*
123. *The following relevant considerations were identified:*
- a. *the planning history (of the area and site including historic structure planning, land use zoning, approved resource consents) is a relevant consideration. As context, in the Golf (2012) case the historic decisions relating to the preservation of the natural character of the natural environment and the protection of it from unnecessary subdivision and development were a relevant consideration. Noting however that the Court did not consider that previous plan provisions should guide or be a baseline for the assessment of the proposed provisions, but simply provide an option for assessment of the appropriate zoning to achieve the purpose of the Act and give effect to the RPS, and achieve objectives of the Plan; and*
  - b. *the tenure of ownership is a relevant consideration with respect to the development rights and ability to engage in planning processes that have the potential to impact those rights.*
124. *To summarise, the approach I have taken when considering rezoning requests and whether an open space zone is appropriate for privately-owned land, I have undertaken a considered, step-by-step*

assessment of the planning history including the ODP zone and approved resource consents as relevant to inform my advice to the Panel. I have not simply adopted a position that applying an open space zone to privately-owned land is inappropriate, or that zoning should simply reflect the current ODP zoning or proposed use.

### 9 Comber Place, Johnsonville

130. In response to Coronation Real Estate Ltd [62.1 and 62.5] and WCC [266.47] I note that the ODP applies a split zone of Outer Residential and Open Space B to 9 Comber Place (as shown in Figure 6.). A resource consent has been approved for development (Council ref: SR 293235; and SR 515059) and earthworks have commenced on site. I also note that the split zoning in the ODP appears to follow the Hilltops and Ridgelines Overlay (shown as brown outlined and dotted area) of the ODP which has been carried through to the PDP (Figure 7.).



Figure 6. 9 Comber Place - WCC ODP zoning



Figure 7. 9 Comber Place – WCC PDP zoning and Hilltops and Ridgelines Overlay (arrows identify small portions of the site referred to in this report)

131. Due to the historic zoning and the consented and commenced development of part of the site, I do not consider it appropriate that the entire site is zoned NOSZ as notified in the PDP noting that WCC [266.47] confirmed this was an error.
132. I agree that the northern part of the site at 9 Comber Place zoned Outer Residential in the ODP (Figure 6.) should be rezoned to MRZ including the residual parts of northern section of the site where the Ridgelines and Hilltops Overlay applies (small triangles illustrated by Figure 7). The approved resource

consent plans (Council ref: SR515059) confirm low level of landform modification of these two small areas, likely due to the presence of the Ridgelines and Hilltops Overlay in the ODP which remains in the PDP. I do not consider it necessary to retain these small portions of the site as NOSZ and given the Ridgelines and Hilltops Overlay was not applied to residentially zoned land in the PDP, also recommend a consequential amendment to remove the Ridgelines and Hilltops Overlay from these two small areas. The remainder of site, specifically that on approved Lot 13 should (refer Figure 8.), in my opinion, retain a NOSZ.

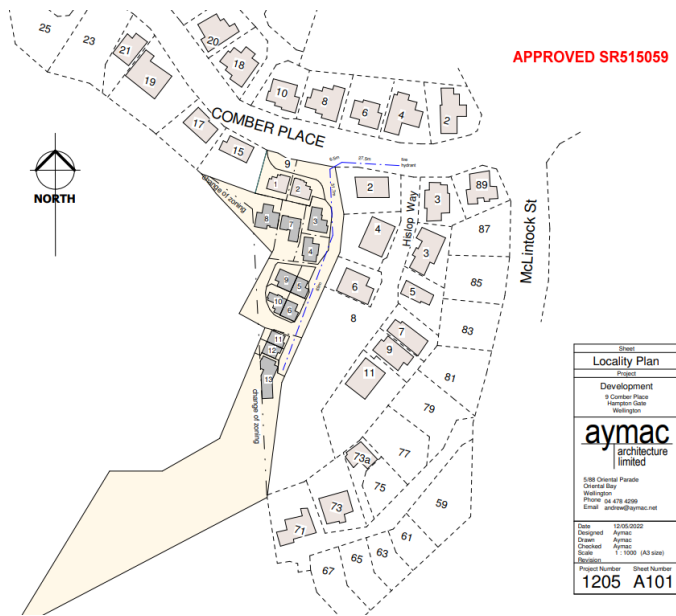
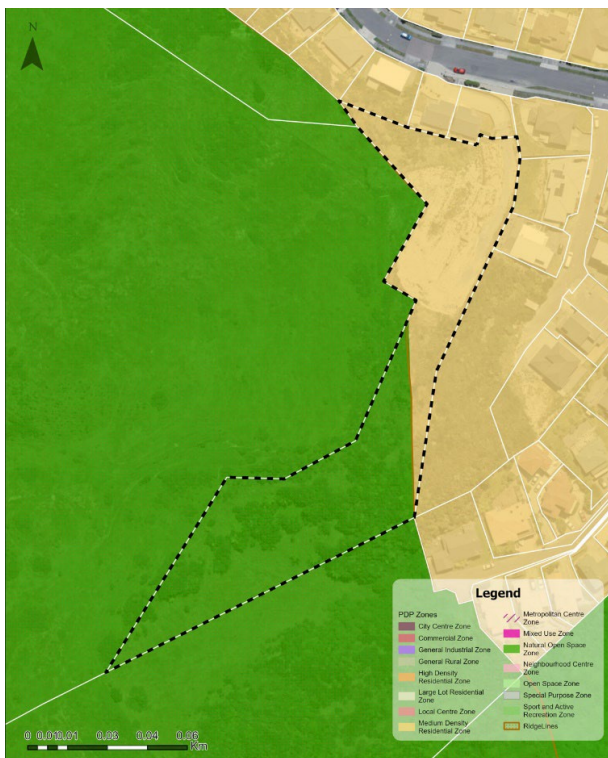


Figure 8.9 Comber Place – approved subdivision plans.

### Summary of recommendations

149. HS7-OSR-Rec6: That that the zoning of 9 Comber Place is rezoned to MRZ, with the Hilltops and Ridgelines Overlay revised, as follows:





# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

1. Details of further submitter	
Submitter: (First and last name, or organisation / company)	Waka Kotahi NZ Transport Agency
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	Attention: Evan Keating Private Bag 106602 Auckland 1143 <a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a>
Phone: (Optional)	██████████
Contact person for submission: (If different to above)	Evan Keating
I wish to be heard in support of my submission at a hearing:	Yes
I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes
2. Criteria applicable to Further Submitter:	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	No
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Waka Kotahi NZ Transport Agency is a provider of nationally significant infrastructure which is impacted under PC1.

3. For the further submitter to action
<p>Service of your further submission:</p> <p>Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	[REDACTED]	Date: 8 March 2024
<p><b>Public information:</b>          Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.          In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>.          You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>• The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested:             <ul style="list-style-type: none"> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li>○ <a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>• Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>• If you are providing suggested text amendments to a provision, please do so in the following format:              Suggested added text, shown as <b>bolded text</b> format              Suggested deleted text, shown as <del>strikethrough</del> format</li> </ul>

<p><b>4. Further submission points</b></p> <p>Please complete the following table with details of which original submission points you support and/or oppose, and why.</p> <p><b>Refer Table below.</b></p>
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## Waka Kotahi – NZ Transport Agency Further Submission Wellington Natural Resources Plan

Submitter	Submission	Decision	Reason
S247 Carrus Corporation Ltd			
S247.006	Suggests the hydrological control definition should be expanded to include reference to the measures proposed to manage the flows and volumes and an acceptable solution that is easily and commonly able to be implemented.	Support	Changes propose include clarity of provisions.
S093 Centre Port Limited			
S93.001	Rule R26: Abrasive blasting outside an enclosed area. Reinstate the 'coastal' icon so that the rule applies in the coastal marine area.	Support	Waka Kotahi has infrastructure in the coastal environment.
S211 Hutt City Council			
Hutt City Council S211.006	Supports the 100 year vision towards full restoration of te-Whanganui-a-Tara's waterways. Seeks clarification on whether the text from "Note In the wai ora state..." is part of the objective or is an advisory note. Considers it is not physically possible for all water bodies to have planted margins, therefore seeks that the requirement for planted margins be qualified with "where possible".	Support	Changes proposed will improve clarity of the provisions.
S211.023	Rule WH.R23: Earthworks - permitted activity. Seeks that road maintenance be excluded from earthworks in the rule, noting that activities such as road resealing would otherwise unnecessarily require resource consent. [...]	Support	Changes proposed will improve clarity of the provisions.
S41 Chorus New Zealand Limited et al			
S41.002	Rule WH.R31: Change of rural land use - discretionary activity. Delete policy: This policy is linked to a rule which makes earthworks between June and September a non-complying activity.	Support	Winter works should be considered as a discretionary activity.
S41.004	Rule WH.R23: Earthworks - permitted activity. Suggests the 'and' after clause b means that any earthworks that are not related to farming activities require consent no matter how small but that this is most likely an error in how the rule is drafted and should be corrected.	Support	Changes proposed will improve clarity of the provisions.
S285 Civil Contractors New Zealand			

S285.008	Impervious surfaces definition. Replace the reference to "stormwater" with 'rainfall', 'water', 'precipitation', or similar. Review and refine the list of exclusions in light of their implications for the rules. Refer to aggregate rather than metal. Remove duplicate references to 'porous or permeable paving'. Reconsider the reference to "reuse" which should be for 'non-potable purposes' to align with RPS language rather than 'grey water'. Reconsider the final two bullet points which have different approaches to permanent plumbing and use different terms for the same outcome (non-potable water use).	Support in part	Changes proposed will improve clarity of the provisions.
S285.010	Stormwater treatment system definition. Delete reference to 'green infrastructure'. Refer to 'contamination in stormwater', rather than 'stormwater contaminants.'	Support	Changes proposed will improve clarity of the provisions.
S285.016	Table 8.4: Target attribute states for rivers . Oppose. Visual clarity and deposited sediment need to be set taking into consideration all contributing sediment sources, and the following points also need to be addressed: 1. How sediment load reductions will be measured in the future 2. How would proportionate contribution to sediment be measured and any reduction in this contribution be measured 3. How much time would the testing take, and who would a 'suitable person' be to conduct the testing? If we do not currently have personnel capacity to conduct this testing, is it wise to write it into the Plan?	Support	Submission raises implementation matters which should be clarified.
S285.024	WH.R23 Amend Rule WH.R23 Earthworks. Reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, [...]	Support	Change will provide for infrastructure.
S248 Ara Poutama Aotearoa the Department of Corrections			
S248.005	Considers only in circumstances where residual adverse effects are more than minor should offsetting (or compensation) be required. Further, in circumstances where offsetting or compensation is required, applicants should not be bound to financial contributions, and should have an option to propose offsetting or compensation in line with Appendix 6 and Appendix 7 of the NPS-FM. Seeks the mandatory requirement for financial contributions as a condition of the rules is removed, but that the financial contributions regime proposed by PC1 continues to be provided for through PC1's policies, as an optional method alongside other offsetting or compensation methods provided for by NPS-FM. Submitter recognises the financial contributions method proposed by PC1 could	Support	Support if financial contributions remain part of NRP (noting Waka Kotahi submissions seek their removal).

	be an effective method of offsetting and should remain open as an option in circumstances where offsetting is required.		
S248.012	Amendment to restricted discretionary activity rule for earthworks, to recognise discharges of sediment are not included under permitted activity rule for earthworks (and are instead covered by the NRP's minor discharge rule R91).	Support	The change will provide clarity as to how provision relates to 5.2.12 All other discharges R91.
S248.023 and S248.047	Policy WH.P15 and Policy P.P14: Stormwater contaminant offsetting for new greenfield development. Considers policy be amended so that its consistent with effects management hierarchy set out in NPSFM, which requires aquatic offsetting or compensation is provided in circumstances where residual adverse effects are more than minor. Considers financial contributions should not be a mandatory means of providing aquatic offsetting, and resource consent applicants should have reasonable opportunity to provide aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM as part of proposals.	Support	Provision will provide consistency with NPS-FW.
S248.050	Policy P.P27: Management of earthworks sites. Modify policy to make more practicable.	Support.	Changes proposed will improve clarity of the provisions.
S248.060	Rule P.R11: All other stormwater discharges – non-complying activity. Considers the move to non-complying activity status for all other stormwater discharges is not clearly explained or justified in section 32 report. Concerned with the jump between permitted activity status for stormwater discharges under rules P.R2, P.R3, and P.R4, and non-complying activity status under this rule.	Support.	Support deletion of non-complying activity.
S248.066 and S248.043	Rule P.R24 and Rule WH.R25: Earthwork - noncomplying activity. Considers that the move to non-complying activity status for all other earthworks is not clearly explained or justified in the section 32 evaluation report. Non-compliance with conditions under rule P.R25 will trigger the non-complying activity rule.	Support	Support deletion of non-complying activity.
S248.073	12 Schedules D Calculation of level of contribution. Considers section D of schedule be amended to clarify the financial contribution is based on area of new impervious surface, not total area of development.	Support in part	Support if Waka Kotahi primary relief (deletion of financial contributions) not accepted.
S245 Tama Potaka, Minister of Conservation			
S245.001	Objective WH.O1: Questions the achievability of having planted margins in all waterbodies.	Support	Share concern regarding practicability of achieving WH.01
S245.002	Policy WH.P1: Improvement of aquatic ecosystem health. Add additional subclause (e) (both provisions).	Oppose	Clause (a) addresses this matter in conjunction with WH.P10.

S245.005 to S245.015	Policies WH.P6, WH.P8, WH.P9, WH.P10, WH.P11, WH.P12, WH.P13, WH.P14, WH.P15, WH.P16 and WH.P17.	Oppose	The changes sought are not specified (beyond being consistent with NZCPS Policy 23).
S245.018	Policy P.P1: Improvement of aquatic ecosystem health. Add additional subclause (e).	Oppose.	Clause (a) addresses this matter in conjunction with WH.P10.
S245.022, 245.023, 245.025, 245.026, 245.028, 245.029 S245.041, 245.048, 245.049, 245.051 S245.057, 245.063, 245.064, 245.066 and S245.074	Policies P.P6, P.P7, P.P9, P.P10, P.P12 and P.P13. Rules WH.R2, WH.R9, WH.R10 and WH.R12 Rules P.R2, P.R8, P.R9 and P.R11. Schedule 29: Stormwater Impact Assessments	Oppose.	The changes sought are not specified (beyond being consistent with NZCPS Policy 23).
S245.072	Method M40: Fish passage action plan programme [...]Requests the effectiveness of fish passage work be monitored and encourages the use of the Fish Passage Assessment tool and recent national guidance Considers an explanation of the Freshwater Fisheries regulations (1983) will help understand how the regulations work vis-à-vis the regional plan provisions.	Support.	Waka Kotahi supports the use of FPAT.
S222 Environmental Defence Society Inc			
S222.035 and S222.081	Policy WH.P2 and Policy P.P2. Seeks to amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities.	Oppose	Use of avoidance is opposed.
S222.050 and S222.092	Policy WH.P29 and P.P27 Management of earthworks. Require setbacks.	Oppose	Relief lacks specificity to assess impact.
S222.063 and S222.105	Rule WH.R23: Earthworks and Rule P.R22 Earthworks. Considers greater setback from waterbodies and coastal marine area is required.	Oppose	Relief lacks specificity to assess impact.
S222.064	Rule WH.R24: Earthworks. Make a discretionary activity.	Oppose.	Earthworks effects and mitigation are well understood and are appropriate to address as a restricted discretionary activity.

S209 Enviro NZ Services Ltd (Enviro NZ)			
S209.003	Stormwater treatment system: Considers complete removal of contaminants is not always practical, depending on the contaminants, the treatment train and weather conditions. Relief: A device, structure or system used to <del>remove</del> <b>reduce</b> stormwater contaminants and/or...	Support.	100% treatment is not a feasible outcome for contaminant treatment.
S209.006 and S209.033	Policy WH.P6 and Policy P.P6 Notes clause (b)(i) requires all consent applications to have upgrades. Considers it inequitable to require upgrades for sites where suitable treatment is already in place and the target is met.	Support	Changes proposed will improve implementation of provisions.
S209.010	Policy WH.P10: Considers the imperative for hydrological control and WSUD measures should be removed, as they are not always required.	Support	Changes proposed will improve implementation of provisions.
S188 Wellington Fish and Game Regional Council			
S188.012	General comments - stormwater management: Requirement for demonstrating functional need, and the effects management hierarchy should be included to bring the Plan into alignment with current national directives.	Oppose.	Relief lacks specificity to assess impact.
S188.064	Policy WH.P29: Management of earthworks. Seeks increased measures to control sediment inputs into waterways.	Oppose.	Relief lacks specificity to assess impact.
S193 Wairarapa Federated Farmers			
S193.067	Policy WH.P1: Improvement of aquatic ecosystem health. Recommends changes for a more strategic and prioritised approach	Support.	Prioritisation will be necessary given the scale of works required.
S193.119	Policy P.P1: Improvement of aquatic ecosystem health. Recommends changes for a more strategic and prioritised approach	Support.	Prioritisation will be necessary given the scale of works required.
S261 Forest & Bird			
S261.015	Considers additional objectives are required to meet NPSFM requirements.	Oppose	Relief lacks specificity to assess impact.
S261.038	Rule R145: All other uses of river and lake beds - discretionary activity. Considers prohibited activity status provides most certainty to achieve the policy direction of the NPSFM and RMA, including protection of fish passage. Make placement of passive gates prohibited (i.e., strengthen rule beyond NES minimum).	Oppose.	Oppose due to lack of s32 assessment and a discretionary activity status is appropriate.
S261.044	Considers prioritisation of areas for restoration of fish passage should be based on both species present in the catchment, as well as the area and quality of the	Support.	Consider wording could be improved grammatically.

	habitat that would become available, noting that providing access for valuable species to poor habitat may be less effective than restoring access to higher quality habitat elsewhere.		
S261.050, S261.133 and S261.134	Objective WH.O2, Objective P.O1, Objective P.O2 Seeks reference to ephemeral watercourses.	Oppose.	The RMA defines “river” as being continually or intermittently flowing body of freshwater The NPS-FW and NES-FW include provisions for the management of permanent and intermittent rivers and streams. These provisions do not extend to ephemeral streams.
S261.067 and S261.147	Policy WH.P5 and Policy P.P5: Localised adverse effects of point source discharge. Considers the policy too narrow, noting it repeats matters from RMA s70, which is not limited to point sources discharges. Seeks the policy is broadened to capture all discharges.	Oppose	Oppose if policy is determined to apply to state highway network discharges.
S261.091 and S261.170	Policy WH.P30 and Policy P.28: Discharge standard for earthworks. Considers controls on deposited sediment are also required.	Oppose.	Changes in sediment depth may have a range of causes including natural movement of sediment.
S261.102 and S261.180	Rule WH.R9 and Rule P.R8: Stormwater from a local authority or state highway network restricted discretionary activity. Reclassify as a discretionary activity rule	Oppose	Effects can be appropriately managed via RDA status.
S261.103 and S261.104	Rule WH.R10 and Rule WH.R11. Considers clause (c) and (b) (financial contributions) respectively do not reflect the effects management hierarchy.	Oppose in part.	Financial contributions can be taken to provide off site 'offset' mitigation.
S261.111 and S261.188	Rule WH.R18 and P.R17: Vegetation clearance. Reclassify as a discretionary activity	Oppose	Effects can be appropriate managed via permitted activity status (per Waka Kotahi primary submission relief).
S261.116 and S261.193	Rule WH.R23 and Rule P.R22: Earthworks - permitted activity. Considers a 5m setback is insufficient to protect ecosystems and maintain water quality. Considers ephemeral watercourses should be referred to as they have ecological value and can reduce contaminant loads when protected.	Oppose.	The RMA defines “river” as being continually or intermittently flowing body of freshwater The NPS-FW and NES-FW include provisions for the management of permanent and intermittent rivers and streams. These



			provisions do not extend to ephemeral streams.
S261.117 and S261.194	Rule WH.R24 and Rule P.R23: Earthworks - restricted discretionary activity. Reclassify as a discretionary activity rule.	Oppose	Effects can be appropriately managed via RDA status.
S261.151	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives. Seeks additional toxicants are referred to.	Oppose	<i>Toxicants</i> has too broad a meaning and contaminants of concern are already identified.
S261.180 and S261.181	Rule P.R9 and Rule P.R10. Considers clause (c) and (b) (financial contributions) respectively do not reflect the effects management hierarchy.	Oppose in part.	Financial contributions can be taken to provide off site 'offset' mitigation.
S043 Fulton Hogan Ltd			
S43.014 and S43.026	Rule WH.R1 and P.R1: Point source discharges of specific contaminants - prohibited activity. Seeks greater flexibility in the rule to avoid perverse outcomes.	Support	Will allow for maintenance activities where appropriate environmental controls are in place.
S43.018	Alter Rules WH.R23, WH.R24 and WH.R25 to provide for low level activities, rather than requiring a non-complying activity status consent for all earthworks between 1 June and 30 September where any run-off occurs. This could be provided alongside additional oversight and control of erosion and sediment control plans by Council so that Council has additional certainty over the measures and mitigation proposed	Support	A more permissive activity status reflecting actual effects and known mitigation is appropriate.
S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies			
S258.004	Interpretation Redevelopment. Seeks exclusion for resurfacing that does not involve re-direction of existing stormwater flows or drainage networks, for minor works to paved surfaces that may not fall into one of the other categories of excluded activities, but which will not alter existing stormwater flows or volumes.	Support	Will assist with the provision of regionally significant infrastructure.
S258.031	Policy P.P6: Point source discharges. Considers policy be deleted due to uncertainty and inappropriateness.	Support if Waka Kotahi primary relief not granted.	Support if Waka Kotahi primary relief not granted.
S258.038	Rule P.R1: Point source discharges of specific contaminants - prohibited activity. Considers this potentially creates a requirement that all discharges from roads must be directed via an interceptor system for treatment, which would be a significant undertaking and is not expected to be the case. Considers rule	Support.	Changes proposed will improve clarity of provisions.

	unnecessary, may result in unintended and inappropriate outcomes and should be deleted.		
S258.044	Rule P.R22: Require implementation of best practice erosion and sediment control measures to reduce the risk of sediment becoming entrained in stormwater. Amend Rule P.22(c)(iv) and (v) to focus on implementation of best practice erosion and sediment control measures rather than the absolute avoidance approach currently proposed. T	Support.	Current wording requires 'no discharge' (P.R22(c)(iv)) and 'prevent a discharge' (P.R22(c)(v)) which is likely unachievable.
S258.045	Amend Rule P.R23, to focus on implementation of best practice erosion and sediment control measures rather requiring compliance with a sediment loading threshold.	Support.	Change focuses on best practice mitigation.
S258.049	Amend Schedule 28 to clearly enable source consent and/or other contaminant management measures to be used as an alternative means of achieving the target load reductions; and make all necessary amendments to clarify the assessment pathway (including the applicable rules) for activities that cannot achieve the copper and zinc target load reductio	Support.	Changes proposed will improve clarity of provisions.
<b>S257 Kainga Ora</b>			
S257.010 and S257.039	Objective WH.O1 and Objective P.O1: Seeks outcomes across PC1 to ensure the Plan Change does not extend beyond that necessary to implement the NPS-FM, noting the considerable additional regulatory burden such a framework imposes upon a range of stakeholders. Includes Consequential changes sought where relevant to reconcile outcomes to changes sought in specific rules.	Support	Provides consistency with national planning direction.
S257.027	Rule WH.R2: Stormwater to land - permitted activity. Clarify that soak pits are permitted	Support	Changes proposed will improve clarity of provisions.
S257.031	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity. Reframe as a RD activity status	Support	Effects can be appropriately managed via RDA status.
S257.054	Policy P.P29: Winter shut down of earthworks. Opposes this policy and the non-complying rule framework. Considers winter works can be adequately considered as a listed matter of discretion within a RDA rule, with conditions being placed accordingly to manage works during this period. Considers the framework lacks real-world practical application. Delete the policy and consequential changes to WH.P29 and the related rule framework.	Support	Winter works can be more appropriately managed through a consent process.
S257.055	Rule P.R2: Stormwater to land - permitted activity. Clarify rule such that soak pits are permitted.	Support	Changes proposed will improve clarity of provisions.
S257.066	Rule P.R24: Earthworks - noncomplying activity. Delete P.R24 with consideration of winter works being a listed matter of discretion under P.R23.	Support	Winter works can be more appropriately managed through a consent process.
S257.072 to S257.077	Maps 90 to 95: Highest and high erosion risk land. Delete maps and provide a definition for 'High and Highest Erosion Risk Land' to more accurately capture such sites which are then subject to the associated rules.	Support	Support subject to definitions being clear.

S240 Porirua City Council			
S240.024	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater ... Considers it unclear if the text from "Note In the wai ora state..." forms part of the objective or it is some form of explanatory/advisory note. If it does form part of the objective, seeks the deletion of the word "note". Considers it is not possible for waters to be in a natural state without the full restoration of the catchment to a pre-human state which is not the intention of this Plan Change, suggest that a qualifier is needed that waters are restored where possible	Support.	Changes propose include clarity and implementation of objective.
S31 Stormwater 360			
S31.005	Table 9.2: Target attribute states for rivers. Target attribute states refer to dissolved metals concentration whereas Schedule 28 (Table 1 and Table 2) refer only to the percentage of Copper or Zinc to be removed. Suggest consistency throughout rules/policies. Relief: Define speciation throughout stormwater rules to achieve TAS defined in Table 8.4. Table 1 and 2 of Schedule 28: Stormwater Contaminant Treatment should reflect dissolved metals.	Support	Changes proposed will improve clarity of provisions.
S31.003 and S31.007	Table 8.4: Target attribute states for rivers And Table 1: Target load Reductions for Copper and Zinc. Suggests target load reductions are unrealistic and questions where the 90% removal via bioretention comes from and why TSS isn't considered under the schedule. Relief not stated.	Support	Support concern on target load reductions being achievable.
S177 Transpower New Zealand Limited			
S177.003	Define the term "greenfield development", and that this term must exclude the operation, maintenance, upgrading, or development of regionally significant infrastructure'.	Support	Changes proposed will improve clarity of provisions.
S177.014	Considers it necessary to exclude the maintenance, upgrading or development of regionally significant infrastructure from any definition of "greenfield development".	Support	Changes will support delivery of regionally significant infrastructure.
S177.018	Objective WH.O1: Considers restoration of natural character in relation to all freshwater bodies and coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure is located over or within freshwater bodies or the coastal marine area. Achieving restoration of natural character implies existing regionally significant infrastructure may need to be removed, and new regionally significant infrastructure may be inappropriate. ... In the wai ora state: Āhua (natural character) is restored <b>to the extent that this is possible</b> , and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character...	Support	Changes will recognise existing regionally significant infrastructure located over or within freshwater/CMA.

S177.025	Policy WH.P29: Management of earthworks: support changes to manage actual or potential adverse effects, to seek uncontrolled loss of soil and sediment from site is minimised rather than requiring all soil and sediment to be retained on site and qualify clause (b) with "where practicable".	Support	Changes propose include clarity of policy.
S177.041	Rule WH.R23: Earthworks - permitted activity. Considers that given minor discharges rule provides for discharge of suspended solids, condition (h) be amended to reflect purpose of erosion and sediment control is to prevent uncontrolled discharge of sediment, rather than all discharge of sediment.	Support	Changes reflect practical implementation of sediment control methodology.
S177.044	Objective P.O1 Considers the objective should acknowledge complete restoration of character may not be possible in all instances, particularly as it relates to regionally significant infrastructure. ... Te Awarua-o-Porirua is a taonga of Ngāti Toa Rangatira and must be respected by others Mauri is restored and waters are in a natural state, <b><u>to the extent that this is possible...</u></b>	Support.	Changes will recognise existing regionally significant infrastructure located over or within freshwater/CMA.
S177.051	Policy P.P27: Management of earthworks sites. Support changes to manage actual or potential adverse effects, to seek uncontrolled loss of soil and sediment from site is minimised rather than requiring all soil and sediment to be retained on site and qualify clause (b) with "where practicable".	Support	Changes proposed include clarity of policy.
S177.072	12 Schedules, A Content. Support changes in Transpower's first and third paragraphs (of submission point), oppose new (second) paragraph (... <b><u>The creation of impervious surfaces through new greenfield development, new roads (not directly associated with a greenfield development) and state highways will result in an increase of stormwater contaminants entering freshwater receiving environments. Stormwater contaminant treatment will be required of new development proposals, however, treatment of contaminants is only practicable for a portion of the contaminant load received from the site. This results in a residual contaminant load still entering freshwater and coastal water receiving environments.</u></b> )	Oppose in part, support in part.	The second proposed paragraph is not necessary to provide for NPS-FW based compensation. The first and third paragraphs as supported.
S177.073	Schedule 30 B Purpose: Various changes to give applicants a reasonable opportunity to undertake their own aquatic offsetting or compensation to address more than minor residual adverse effects and that NPS-FM only requires offsetting or compensation in circumstances where residual adverse effects are more than minor.	Support	Changes support national policy direction
S177.075	Schedule 30 D Calculation of level of contribution: Amend to clarify the financial contribution is based on area of new impervious surface, not total area of development.	Support	Support if Waka Kotahi relief (to remove Schedule 30) is not granted.
S225 Upper Hutt City Council			
S225.019	Amend proposed definition of a 'drain' that would result in all drains being considered 'modified streams';		Changes proposed will improve clarity of the provisions.

S151 Wellington Water Ltd			
S151.002	General submission point: Amend rules for stormwater and wastewater discharges from the local authority networks (and/or the associated Schedules) so that they refer to objective information requirements rather than inviting a detailed assessment against the schedules to determine activity status; and All amendments necessary (including disappling rules in other parts of the NRP) to ensure that the wastewater and stormwater from local authority networks remain a restricted discretionary activity, and the associated rules in PC1 function as a 'one stop shop' in the relevant whaitua. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.006 to S151.009, S151.011	General comments - water bodies, target attribute states, stormwater management	Support	The submission highlights limitations which to some aspects of PC1.
S151.015	Seeks all changes to PC1 that are necessary to give effect to changes to the NPS-FM or its application, should such changes be progressed while PC1 is being considered.	Support	The submission will enable a responsive approach to signalled NPS-FW changes.
S151.055	Objective WH.O2: Seeks the timeframe be altered to 2060 as the 2040 timeframe will render prioritisation of sub-catchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes. Supports the intent of measurable progress in clause (a). Considers clause (b) should have a maintenance component, rather than just improvement and there should be a comma after 'stability'. Considers clauses (f) and (g) need to be combined or better distinguished.	Support	Proposed changes generally improve implementation of objective.
S151.057	Table 8.1 Coastal water objectives. Alter timeframe to 2060 and Withdraw table until further detail in relation to the baseline states and required timeframes can be added. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Support	Table 8.1 lacks the required information to set baseline states for the Coastal Water Management Units to assess whether the state is being maintained or improved.
S151.061, S151.063, S151.064, S151.065 and S151.069	Table 8.4: Target attribute states for rivers. Provide further information on the baseline state, and a detailed assessment of the implications of the TAS provisions.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents and river environs.
S151.068	Table 8.4: Target attribute states for rivers. Dissolved copper/dissolved zinc Considers the approach of Policy P.P9 does not recognise the other sources of zinc and copper outside of WWL's control (e.g. zinc roofs, copper based brake discs). Considers the required changes will require an approach outside of	Support.	Share concern regarding technical feasibility of achieving targets specified.

	WWL's control that will take years and significant investment to enact, and may not have occurred by 2040. Notes the TAS is for dissolved copper and dissolved zinc can be more challenging to remove through stormwater treatment devices than total copper and total zinc.		
S151.073	Policy WH.P2: Amend policy, including clause (b), to state that redevelopment in existing urban will be <i>encouraged</i> noting this provides opportunities to reduce the existing contaminant load, and redevelopment will be required to reduce the existing contaminant load.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.076	Table 8.5: Sediment load reductions required to achieve the visual clarity [...]. Set TAS for visual clarity and deposited sediment by taking into consideration all contributing sediment sources, and address the following points: [...]	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.077	Policy WH.P6: Cumulative adverse effects of point source discharges. Amend policy so the exclusion of stormwater and wastewater is explicit.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.082	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy. Proposes substantial changes to policy.	Support in part.	Some of the range of proposed changes generally improve implementation of policy.
S151.127	Rule P.R8: Stormwater from a local authority or state highway network restricted discretionary activity. Proposes substantial changes to rule.	Support in part.	Some of the range of proposed changes generally improve implementation of rule.
S151.139 to S151.156	Schedule 31: Stormwater Management Strategy - Te Whanganui-aTara and Te Awarua-o-Porirua.	Support.	Changes proposed will improve clarity of the provisions.
S151.090	Rule WH.R1: Point source discharges of specific contaminants - prohibited activity. Add new clause to the end of the existing rule as follows:... <b>Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network.</b> Or alternative relief.	Support	Changes proposed will improve clarity of the provisions.
S151.096	Rule WH.R9: Stormwater from a local authority or state highway network. Provisions to be revised as follows: [...]	Support	Changes proposed will improve clarity of the provisions.
S151.100	Rule WH.R24: Earthworks. Provide an exemption for Regionally Significant Infrastructure to reflect the volume of work that needs to be undertaken for RSI	Support	Waka Kotahi provides RSI.
S151.104	Table 9.1: Coastal water objectives. Table lacks the required information to set baseline states for the Coastal Water Management Units to assess whether the state is being maintained or improved and lacks timeframes for when the	Support	Waka Kotahi will be subject to the same provisions

	baseline will be determined. Withdraw the table until the further detail can be added.		relative to stormwater network discharge consents.
S151.107	Table 9.2: Target attribute states for rivers. Provide further information on the baseline state, and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis. Alter timeframe to 2060. Include guidance on how to measure the proportion from WWL's networks with inputs from other sources within the catchment. Withdraw the table until the further detail can be added.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.109	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives. Seeks a range of changes to, among other things, provide clarification how the FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32. Provide clarity over relationship between 'non-regulatory methods' and 'work programmes'. Amend policy to the extent necessary to appropriately reflect these interrelationships.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.112	Table 9.4: Part Freshwater Management Unit sediment load. Considers a detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation [...] Furthermore, sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL's control including human land uses and activities and natural factors.	Support	Waka Kotahi will be subject to the same provisions relative to stormwater network discharge consents.
S151.113	Policy P.P6: Point source discharges. Amend policy to ensure the exclusion of stormwater and wastewater needs to be explicit.	Support	Changes proposed will improve clarity of the provisions.
S151.116	Policy P.P12: Managing stormwater network discharges [...]. Proposes a wide range of changes to policy.	Support	Changes proposed will improve clarity of the provisions.
S151.123	Rule P.R1: Point source discharges of specific contaminants - prohibited activity. Add new clause to the end of the existing rule as follows: ... <b>Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network.</b> Or alternative relief.	Support	Changes proposed will improve clarity of the provisions.
S151.127	Rule P.R8: Stormwater from a local authority or state highway network restricted discretionary activity. Proposes a wide range of changes to policy.	Support	Changes proposed will improve clarity of the provisions.
S151.131	Rule P.R23: Earthworks. Provide an exemption to (b) for RSI.	Support	Waka Kotahi provides RSI.
S151.133 to S151.156	Range of amendments to Schedule 31. Support in part as relevant to State highway network discharges.	Support	Changes proposed will improve clarity of the provisions.

S206 Winstone Aggregates			
S206.006	Insert new definition of "aquatic offset" as follows: Aquatic offset Has the same meaning as in the National Policy Statement for Freshwater Management (as set out below): ...	Support	Support consistency with NPS-FW
S206.007	Insert new definition of "aquatic compensation" as follows: Aquatic compensation Has the same meaning as in the National Policy Statement for Freshwater Management (as set out below): ...	Support	Support consistency with NPS-FW
S206.023	Interpretation Earthworks: Seeks for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua to include all exemptions provided in the existing definition of earthworks. Notes the use of "and" implies all earthworks exclusions are conjunctive and seeks clarification that the exclusions are disjunctive through the use of "or". Supports clarification provided to exemption clause (i) of the existing definition.	Support	Exclusion will clarify repair and maintenance ((d) and (g) of proposed) is able to be undertaken.

**Further Submitters to be served:**

Carrus Corporation Ltd (S247) [elliott.thornton@cuttriss.co.nz](mailto:elliott.thornton@cuttriss.co.nz)

Centre Port Limited (S093) [William.Woods@centreport.co.nz](mailto:William.Woods@centreport.co.nz)

Chorus et al (S41) [tom@incite.co.nz](mailto:tom@incite.co.nz)

Civil Contractors NZ (s285) [Fraser@civilcontractors.co.nz](mailto:Fraser@civilcontractors.co.nz)

Ara Poutama Aotearoa Department of Corrections (s248) [andrea.millar@corrections.govt.nz](mailto:andrea.millar@corrections.govt.nz)

Minister of Conservation (s245) [hfamilton@doc.govt.nz](mailto:hfamilyton@doc.govt.nz)

Environmental Defence Society Inc (s222) [shay@eds.org.nz](mailto:shay@eds.org.nz)

Enviro NZ Services (s209) [kaaren.rosser@environz.co.nz](mailto:kaaren.rosser@environz.co.nz)

Wellington Fish and Game Regional Council (s188) [acoughlan@fishandgame.org.nz](mailto:acoughlan@fishandgame.org.nz)

Forest and Bird (s261) [freshwater@forestandbird.org.nz](mailto:freshwater@forestandbird.org.nz)

Fulton Hogan (s43) [helen.caley@fultonhogan.com](mailto:helen.caley@fultonhogan.com)

BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies (s258) [georgina.mcpherson@slrconsulting.com](mailto:georgina.mcpherson@slrconsulting.com)

HCC (s211) [tim.johnstone@huttcity.govt.nz](mailto:tim.johnstone@huttcity.govt.nz)

Kainga Ora (s257) [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)

PCC (s240) [Helen.Oram@porirua.govt.nz](mailto:Helen.Oram@porirua.govt.nz)

Transpower (s177) [Environment.Policy@transpower.co.nz](mailto:Environment.Policy@transpower.co.nz)

Stormwater360 [juliaw@stormwater360.co.nz](mailto:juliaw@stormwater360.co.nz)

Wairarapa Federated Farmers (S193) [emcgruddy@fedfarm.org.nz](mailto:emcgruddy@fedfarm.org.nz)

WCC (S33) [Michael.Duindam@wcc.govt.nz](mailto:Michael.Duindam@wcc.govt.nz)

Wellington Water (S151) [victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)

Winstone Aggregates (s206) [philip.heffernan@winstoneaggregates.co.nz](mailto:philip.heffernan@winstoneaggregates.co.nz)



**FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 1 TO THE NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION UNDER CLAUSE 8 SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

**TO:** Greater Wellington Regional Council ("**Council**")  
[regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

**SUBMITTER:** Waste Management NZ Limited ("**Waste Management**")

**SUBMISSION ON:** Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region ("**PC1**")

**Introduction**

1. Waste Management is New Zealand's largest waste and environmental services company. It has a variety of interests in the Wellington Region, including a hazardous waste facility at 57-59 Port Road, the Seaview Refuse Transfer Station at 27 Seaview Road, and a proposed resource recovery park at 30 Benmore Crescent.
2. Waste Management has an interest in the proposal which is greater than the interest of the general public as it made a primary submission and because the development potential of its sites will be directly impacted by PC1.

**Scope of further submission**

3. Waste Management made an original submission on PC1 on 15 December 2023. Waste Management wishes to make a further submission on PC1. This further submission supports and opposes various submission points as set out in **Attachment 1**.
4. Waste Management could not gain an advantage in trade competition through this submission.

### Reasons for further submission

5. For those provisions of PC1 that require amendment as sought by Waste Management's original submission, those provisions will not (without the amendments proposed by Waste Management):
- (a) promote sustainable management of resources or achieve the purpose of the Resource Management Act 1991 ("**RMA**") and are contrary to Part 2 and other provisions of the RMA;
  - (b) meet the reasonably foreseeable needs of future generations;
  - (c) enable social, economic and cultural wellbeing;
  - (d) achieve integrated management of effects of use, development or protection of land and resources in the Wellington Region;
  - (e) enable the efficient use and development of Waste Management's assets and operations, and of those resources; and
  - (f) appropriately achieve the objectives of the Regional Policy Statement, in term of section 32 of the RMA.

### Specific reasons for submission

6. Without derogating from the generality of above, the specific reasons for Waste Management's further submissions as set out in **Attachment 1** to this submission.

### Decision Sought

7. Waste Management seeks for the submissions which Waste Management supports to be allowed, and the submissions which Waste Management opposes to be disallowed.

8. Waste Management wishes to be heard in support of this further submission. If others make a similar submissions consideration would be given to presenting a joint case with them at any hearing.

**Name:** **Jim Jefferis**  
Head of Environment and Consents

**Date:** 8 March 2024

**Address for Service:** C/O Jim Jefferis  
Waste Management NZ Limited  
Private Bag 14919  
Panmure  
**Auckland 1741**

**Email:** [jjefferis@wm.nz](mailto:jjefferis@wm.nz)

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
<b>Interpretation - High Risk industrial and trade premise ('HRITP')</b>					
S226 Higgins Contractors Ltd	S226.002	<p>Considers definition too vague and could lead to misinterpretation. Suggests for activities not listed, intent of definition appears to be if risk of contaminants entering stormwater, HRITP rules are relevant. Concerns definition puts too much interpretation to the applicant, with risk of non-compliance if Council interpret the risk of the activity differently to applicants.</p> <p>Relief Sought: Amend definition of HRITP to be more specific and clearer in the intent. Provide exceptions for HRITPs for example where discharges are treated via an interceptor.</p>	Support in part	The current definition is ambiguous and the intent (to stop high risk contaminants becoming entrained in stormwater discharges) needs to be clear.	Allow in Part
S220 Rosco Ice Cream Ltd	S220.003	Notes the key points of this definition are that the activity involves contaminants / hazardous substances and that these are exposed to rain. Conditionally supports the definition as the definition requires exposure to the weather.	Support	The definition needs to be clear that it is areas of a site exposed to rain that fall within the definition.	Allow
S207 Firth Industries Ltd	S207.005	<p>Opposes list of activates [sic] which 'could' be high risk industrial or trade premises. Includes various activities which could be managed so that hazardous substances are not exposed to rain (and therefore would not fall within the definition).</p> <p>Relief sought: Seeks definition be amended to delete the list of activities that 'may' be industrial and trade activities.</p>	Support in part	The definition needs to be clear that it is areas of a site exposed to rain that fall within the definition. Waste Management is neutral on deletion of the list of activities.	Allow in part

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S183 Yvonne Weebar	S183.021	Submitter supports definition – no relief sought.	Oppose	Amendments to the definition are required to make it clear.	Disallow
S186 Guardians of the Bay	S186.013				
S209 Enviro NZ Services Ltd (Enviro NZ)	S209.001	Considers limiting the definition to premises that use contaminants that are exposed to rain does not penalise entirely internal operations and encourages good environmental outcomes.	Support in Part	Waste Management supports the submission in so far it recognises that activities that are internal are not included in the definition of high risk premise.	Neutral
<b>Definition – Impervious Surface</b>					
S26 Christine Stanley	S26.010	Concerned that specifications regarding impervious surface water collection into tanks is not included in costing assessments in the s32 report.  Relief Sought: Delete definition	Oppose	Waste Management supports a definition of impervious surface in order to clearly apply stormwater rules. However, this definition needs to be amended as per Waste Management's primary submission.	Disallow
S33 Wellington City	S33.002	Definition is complex and difficult to implement. The use of impermeable surfaces (permeability) is also a matter of consideration for District Plans as set out in 80E of the RMA and 3.5(4) of the National Policy Statement on Freshwater Management.  Relief sought: Delete definition.	Oppose	Waste Management agrees with the submitter that the definition is complex and difficult to implement.  However, Waste Management supports a definition of impervious surface in order to clearly apply stormwater rules.	Disallow
S38 Summerset Group Holdings Limited	S38.002	Considers roofing with rainwater collection, complying with hydraulic neutrality rules included in recent district plans in these catchments should not be considered an impervious surface. Suggests that the implementation of grey water reuse would add to development costs, and is not a	Support in part	Waste Management agrees that surfaces draining to tanks should be excluded from the definition. However, if a development chooses to utilize grey water tanks, these should also be excluded from the definition of impermeable surface.	Allow in part

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>requirement of any regulation including PC1 or the Natural Resources Plan.</p> <p>Relief sought: Amend - Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes: • roofs • paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, and excludes: • grassed areas, gardens and other vegetated areas • porous or permeable paving • slatted decks which allow water to drain through to a permeable surface • porous or permeable paving and living roofs • roof areas with rainwater collection and reuse • any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed).</p>			
S105 Hannah Bridget Gray (No2) Trust	S105.004	<p>Use of rain tanks, grey water reuse systems or any form of water collection and reuse should be encouraged as a responsible and environmentally friendly use of water rather than included in calculations as if it were environmentally damaging.</p> <p>Relief Sought: <del>roof areas with rainwater collection and reuse any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)</del></p>	Oppose	Waste Management agrees use of tanks should be encouraged but opposes the deletion of tanks from the exclusions to what is considered 'impervious surface'.	Disallow
S151 Wellington Water Ltd	S151.002	Broadly supports the definition, but reserves position as to the detail as some technical changes required. For example, the use of	Support in part	Waste Management considers exemptions for rainwater tanks should be retained as	Allow in part

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>"stormwater" here is not consistent with how that term is defined in the Natural Resources Plan and some other terms are used inconsistently. Concerned about how the exemptions for tanks and rainwater collection will impact the applicability of the stormwater rules.</p> <p>Relief Sought: Replace the reference to "stormwater" with 'rainfall', 'water', 'precipitation', or similar. Review and refine the list of exclusions in light of their implications for the rules. Refer to aggregate rather than metal. Remove duplicate references to 'porous or permeable paving'. Reconsider the reference to "reuse" which should be for 'non-potable purposes' to align with RPS language rather than 'grey water'. The final two bullet points have different approaches to permanent plumbing and use different terms for the same outcome (non-potable water use); this needs to be reconsidered also. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>		<p>part of the definition. Waste Management also supports clarification of the definition.</p>	
S161 Gillies Group Management Ltd	S161.008	<p>Considers a roof with rainwater collection should not be considered an impervious surface where it complies with hydraulic neutrality rules. Considers the implementation of greywater reuse is not a regulatory requirement and will significantly add to development costs.</p>	Oppose	<p>Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also should be excluded from the definition of impervious surface.</p>	Disallow

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		Relief sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection <del>and reuse</del> <del>any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed):</del>			
S165 Pukerua Holdings Limited	S165.008	Relief sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection <del>and reuse</del> <del>any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed):</del>	Oppose	Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also should be excluded from the definition of impervious surface.	Disallow
S169 Koru Homes NZ Limited	S169.002	Relief sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs roof areas with rainwater collection <del>and reuse</del> <del>any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed):</del>	Oppose	Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also should be excluded from the definition of impervious surface.	Disallow
S173 Arakura Plains Development Limited	S173.008	Relief sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface porous or permeable paving and living roofs	Oppose	Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also	Disallow



## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>roof areas with rainwater collection <del>and reuse</del>  <del>any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed).</del></p>		should be excluded from the definition of impervious surface.	
S210 Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate	S210.009	Seeks definition of 'impervious surfaces' be retained as currently written.	Oppose	The definition needs to be clarified as per Waste Management primary submission.	Disallow
S220 Rosco Ice Cream Ltd	S220.005	Provide technical guidance on the detail of how to achieve porous/permeable paving and the reticulation/storage systems required for water collection and reuse.	Support	Technical guidance will assist in interpretation of the plan provisions and the definition of impermeable surface.	Allow
S240 Porirua City Council	S240.011	<p>Notes there is no rule requiring rainwater reuse in PC1 or the Natural Resources Plan. Supports 'roof areas with rainwater collection' being excluded, as this is regulated through the Three Waters Chapter of the Proposed Porirua District Plan subject to Wellington Water specifications that provide for some limited reuse for gardening but do not require tanks to be plumbed back into the house. Concerns that this is a significant cost that not been assessed in the s32 Evaluation.</p> <p>Relief Sought: excludes: grassed areas, gardens and other vegetated areas porous or permeable paving slatted decks which allow water to drain through to a permeable surface</p>	Oppose	Waste Management agrees that areas draining to a rain water tank should be excluded from the definition of impervious surface. However, where developers choose to use a grey water tank, this also should be excluded from the definition of impervious surface.	Disallow

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		porous or permeable paving and living roofs roof areas with rainwater collection and reuse <del>any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed).</del>			
S257 Kāinga Ora	S257.005	Retain notified definition.	Oppose	Waste Management considers the definition needs to be amended as per Waste Management's primary submission.	Disallow
S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Co	S258.003	Supports impervious surfaces definition.	Oppose	Waste Management considers the definition needs to be amended as per Waste Management's primary submission.	Disallow
<b>Definition – Stormwater</b>					
S220 Rosco Ice Cream Ltd	S220.007	Supports the definition of stormwater, in particular the exclusions. Notes a typographical error referring to rules in sections "8.2 and 9.2", which should refer to sections 8.3 and 9.3.  Relief Sought: Correct typographical error to refer to correct sections.	Support	Waste Management agrees with correction of typographical errors identified and retention of the definition.	Allow
<b>Definition – Stormwater Network</b>					
S33 Wellington City Council	S33.006	Considers it appropriate to consider stormwater treatment systems that serve more than one property.  Relief sought: Retain as notified.	Oppose	Assets in private ownership should not be defined as part of the stormwater network. Considers definition should be amended as per Waste Management primary submission.	Disallow
<b>Definition – Unplanned Greenfield Development</b>					
S286 Taranaki Whānui	S26.009	Relief sought: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 and excludes: -land either currently owned by	Support in part	Waste Management supports land identified as "unplanned greenfield development" on the maps owned by Mana Whenua being	Allow in part

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>mana whenua, or identified for potential future ownership through a right of first refusal or deferred selection process through Treaty Settlements. <del>which also require an underlying zone change (from rural/nonurban/ open space to urban) through a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.</del></p>		<p>excluded from the definition of Unplanned Greenfield Development.</p> <p>Waste Management, however, considers that Map 89 needs to be amended as per Waste Management's original submission.</p>	
Kainga Ora S257	S257.009	<p>Amendments sought a full review of, and expansion to the areas identified as planned/existing urban areas on maps 86-89. Exclusion of land zoned as open space areas from unplanned greenfield areas where these are located in an urban environment. Include new definition for Greenfield Development. Within this definition, seek also an exclusion of infrastructure works (as infrastructure works often traverses non-urban zones to service the urban environment). Further infrastructure works (including network upgrades) can result in the enhancement and betterment of environmental and water quality outcomes). Delete associated Prohibited Activity rule framework / or reduce activity status to align with the National Policy Statement-Urban Development. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.</p>	Support in Part	<p>Waste Management supports the part of the submission that seeks deletion of associated prohibited activity rule framework. Waste Management has no position on open space zoned land.</p>	Allow in part

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S252 Thames Pacific	S252.008	<p>Requests the deletion of this definition and all subsequent references to unplanned greenfield development. <del>Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. Amend definition to align with zones under a District Plan and avoid a plan change to both District and Regional Plans:</del></p> <p>Should the above relief not be obtained, submitter seeks the following revision: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 not zoned as urban within a District Plan. <del>which also require an underlying zone change (from rural/nonurban/open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are identified on maps 86, 87, 88 and 89 those areas and include those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. And consequential amendments to other references or policies</del></p>	Support in part	<p>Waste Management supports the part of the submission that refers to the requirement for a plan change. Waste Management considers the definition should be further amended to clarify what is defined as greenfield development, as per Waste Management's primary submission.</p> <p>Waste Management agrees with the submitter in that sometimes a resource consent application is more appropriate or efficient than a plan change.</p>	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		as needed to align with the above amendment.			
S248 Ara Poutama Aotearoa the Department of Corrections	S248.018	Provide a definition of "greenfield development" as follows: Greenfield development: Urban development on land that has not been previously developed for urban land uses. As a consequential amendment, add a definition for "urban development" in the Natural Resources Plan to match the Regional Policy Statement definition as follows: Urban development is subdivision, use and development that is characterised by its planned reliance on reticulated services (such as water supply and drainage) by its generation of traffic, and would include activities (such as manufacturing), which are usually provided for in urban areas. It also typically has lots sizes of less than 3000 square metres.	Support in Part	Waste Management agrees the definition needs to be clarified and that greenfield development is characterized by reliance on reticulated infrastructure found in urban and future urban zones. As per Waste Management primary submission, Waste Management consider the definition should be clarified to refer to public infrastructure.	Allow in part
S247 Carrus Corporation Ltd	S247.008	Requests the deletion of this definition and all subsequent references to unplanned greenfield development. <del>Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023. Amend definition to align with</del>	Support in Part	Waste Management agrees the definition needs to be clarified and that greenfield development is characterized by reliance on reticulated infrastructure found in urban and future urban zones. As per Waste Management's primary submission, Waste Management considers the definition should be clarified to refer to public infrastructure.	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>zones under a District Plan and avoid a plan change to both District and Regional Plans:</p> <p>Should the above relief not be obtained, submitter seeks the following revision: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 not zoned as urban within a District Plan. which also require an underlying zone change (from rural/nonurban/open space to urban) though a District Plan change to enable the development. Note: Unplanned greenfield areas are identified on maps 86, 87, 88 and 89 those areas and include those areas that do not have an urban or future urban zone at the time of Plan Change.</p>			
S240 Porirua City Council	S240.014	<p>Concerned the definition and associated provisions may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have positive outcomes, including for freshwater. Notes this is covered in more detail in relation to Policy P.P2 in the submission. Considers Map 86 will not align with the decisions version of the Proposed Porirua District Plan (covered in more detail in relation to Map 86). Considers rezoning development areas requires the application of a range of zones, including from rural to open space zones for future reserves, therefore the following is not always</p>	Support in Part	<p>Waste Management agrees with the concern that the provisions may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have a positive outcome. Waste Management has no position on Map 86. Waste Management disagrees and does not support the proposed amendment to the definition in so far as it makes reference to a requirement for a plan change to occur.</p>	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p>accurate: '(from rural/nonurban/ open space to urban)', nor is the note.</p> <p>Relief Sought: Amend definition as follows: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which also require an underlying zone change (from rural/nonurban/ open space to urban) though a District Plan change to enable the development. <del>Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.</del></p>			
S238 Greater Wellington Regional Council	S238.009	Amend definition as follows: Greenfield development within areas identified as 'unplanned greenfield area' on maps 86, 87, 88 and 89 which as at 30 October 2023 also requires an underlying zone change to an urban zone, future urban zone or settlement zone to enable the development.	Oppose	Waste Management supports the intent to clarify the definition. However, as per Waste Management's primary submission, no development 'requires' a plan change unless it is prohibited. It is possible to seek resource consent for the development of an individual site and sometimes a more efficient pathway than undertaking a plan change.	Disallow
S225 Upper Hutt City Council	S225.048	Opposes extent of Map 88 as does not accurately reflect Council plan change 50 notified on 4 October 2023 and is inconsistent around proposed settlement zone land. Considers provision should apply from date of PC1 decision and not date of notification. Considers it gives landowners and developers ability to complete planning processes (such as in train resource consents or plan changes). Current date as	Support	Waste Management agrees with amendments that recognize planning processes that are in place in terms of the effective date of the provisions. As per Waste Management primary submission Waste Management consider an exclusion should also be made where resource consent has been lodged for urban development.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		notified, would circumvent ongoing planning process and prevent rezoning submissions on active plan changes.			
S217 R P Mansell; A J Mansell, & M R Mansell	S217.003	<p>Concerned development in areas identified as unplanned greenfield development require a plan change process to enable the development. Considers the dual plan change process required under PC1 to change greenfield development from unplanned to planned should not be used as an alternative to the resource consenting process. Concerned the private plan change process will not be effective. Opposes only planned greenfield development being provided for in PC1 and unplanned greenfield development requiring a dual plan change. Considers that the prohibition of activities is contrary to the National Policy Statement-Urban Development. Considers insufficient evidence is provided in the s32 report.</p> <p>Relief Sought: All greenfield development to be considered on their merits, and rely on provisions in the Natural Resources Plan and district plan zoning/provisions to manage adverse effects of greenfield development. Delete all provisions referencing "unplanned greenfield development". Delete definition for "unplanned greenfield development"</p>	Support in part	Waste Management agrees with the submission in so far as in some occasions a resource consent process may be a more effective approach to resource management than a plan change process.	Support in part
S207 Firth Industries Limited		Provide a definition of "greenfield development" as follows: Greenfield development means any urban development undertaken within a site or sites has not been	Support in Part	Waste Management agrees that the definition needs to define greenfield development. However, Waste Management considers that in some cases,	Allow in part



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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		previously used for urban land use. As a consequential amendment, provide a definition of "urban development" to match the Regional Policy Statement definition as follows: Urban development is subdivision, use and development that is characterised by its planned reliance on reticulated services (such as water supply and drainage) by its generation of traffic, and would include activities (such as manufacturing), which are usually provided for in urban areas. It also typically has lots sizes of less than 3000 square metres.		the development of a site that has not been previously developed, is not appropriately defined as greenfield development. As per Waste Management's primary submission, the definition should make reference to the need for public infrastructure construction to support the development.	
S30 Dean Spicer	S30.005	Remove prohibited activity status and allow applications for new unplanned greenfield developments.	Support	Waste Management agrees with the submitter that in some occasions an application for resource consent may be appropriate for greenfield development, or for areas identified as 'unplanned greenfield development areas'.	Allow
S33 Wellington City Council	S33.018	Amend definition to take into account smaller sites within the existing urban boundary or delete definition.	Support	Waste Management agrees that some smaller sites within the existing urban boundary should be taken into account.	Allow
S37 Donald Skerman	S37.001	Supports the prohibition of unplanned greenfield development, the requirement to treat 85% of stormwater on urban development sites, and the mandatory financial fee for greenfield developments.	Oppose	Waste Management oppose the prohibition of greenfield development as set out in Waste Management's primary submission.	Disallow
<b>Map 89</b>					
S220 Rosco Ice Cream Limited	S220.021	Opposes the inclusion of the site at 30 Benmore Crescent within the Hutt City Council unplanned greenfield area as shown on Map 89. Notes the site is currently zoned General Rural in the Lower Hutt City Council	Support	Waste Management considers the site at 30 Benmore Crescent should be excluded from Map 89.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		District Plan but the Draft District Plan Review proposes to rezone the site as General Industrial. Notes the site has been subject to resource consents and is currently subject to additional resource consent applications, and Rosco and Lower Hutt City Council have been involved in planning for the development of the site for the last three years.			
S213 Pareraho Forest Trust	S213.030	Support inclusion of map. Considers it crucial any public or private plan change enabling such development must also propose to change this Plan in order that environmental effects can be fully assessed.  Relief sought: retain as notified	Oppose	Waste Management disagrees a public or private plan change to the Natural Resource Plan is necessary. It is not an efficient approach to resource management for the reasons set out in Waste Management's primary submission.	Disallow
S221 Hutt City Council	S211.025	Notes Map 89 reflects the Operative District Plan, however Council is yet to notify a district plan that fully implements the National Policy Statement-Urban Development including the identified demand for housing and business land, therefore considers the avoid/prohibited approach may conflict with the submitter's ability to give effect to the National Policy Statement-Urban Development.  Relief Sought: Amend Map 89 to reflect the capacity required to meet identified housing and business demand in Hutt City.	Support in part	Waste Management supports amendment to include land that provides identified capacity for business land being identified on Map 89 (and excluded from unplanned development areas). Waste Management notes the site at 30 Benmore Crescent is proposed to have an industrial zone in a draft of the Proposed District Plan.	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
<b>Policy WH.P2</b>					
S286 Taranaki Whanui	S286.032	<p>Considers planning processes need to be flexible to ensure aspirational outcomes are achieved.</p> <p>Relief sought: <del>(a) prohibiting unplanned greenfield development and for managing other greenfield developments by minimising the contaminants and requiring financial contributions as to offset adverse.</del></p>	Support	A prohibited activity status is not appropriate and will hinder flexibility in planning processes.	Allow
S261 Forest & Bird	S286.063	<p>Relief sought: Amend (a): prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants <del>so that adverse effects are avoided and requiring financial contributions as to offset adverse effects from residual stormwater contaminants</del> Amend clause (e) so that it refers to ephemeral watercourses, wetlands and estuaries. Add clause:(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited.</p> <p>Any further consequential or alternative relief as may be necessary and appropriate to address concerns.</p>	Oppose	<p>The submitter's proposed amendment does not recognize that in some instances water quality can be maintained (or enhanced) by mitigation measures and some level of residual effect may be acceptable in some cases. The use of “avoid” is a very high test and would be overly onerous.</p> <p>As per Waste Management's primary submission the approach to prohibiting activities is not supported.</p>	Disallow
S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	S258.007	Retain Policy WH.P2 as notified.	Oppose	Waste Management disagrees that unplanned greenfield development should be prohibited as per Waste Management's primary submission.	Disallow
S287 Kainga Ora	S287.011	Remove reference to prohibiting unplanned greenfield development at WH.P2(a). Any further, alternative or consequential relief as	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		may be necessary to fully achieve the relief sought in this submission.			
S252 Thames Pacific	S252.009	Amend policy to remove reference to prohibiting unplanned greenfield development. <del>(a) prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants;	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S251 Peka Peka Farm Limited	S251.005	Relief sought: <del>(a) prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants;	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S248 Ara Poutama Aotearoa the Department of Corrections	S248.040	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) <del>prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the discharge of stormwater contaminants from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor, requiring aquatic offsetting or compensation (which	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		may include financial contributions) <del>as to offset adverse effects from residual stormwater contaminants, and</del>			
S247 Carrus Corporation Ltd	S247.009	Amend policy to remove reference to prohibiting unplanned greenfield development. <del>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.</del>	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S246 Water NZ	S246.031	Generally supportive of policy and the clauses to achieve the policy. Relief sought not stated.	Oppose	Waste Management is not supportive of the policy, specifically clause (a) that refers to prohibiting development.	N/A no relief sought.
S245 Tama Potaka, Minister of Conservation	245.003	Amend Policies to be consistent with New Zealand Coastal Policy Statement Policy 23. Requests the following wording be added Promoting design options that reduce flows to stormwater reticulation systems at source.	Neutral	Waste Management does not have a position on the amendment proposed but Waste Management seeks the policy be further amended as per its primary submission.	Neutral
S236 Parkvale Road Limited	S236.006	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) <del>prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the contaminants from greenfield developments <del>and requiring financial contributions as to offset adverse</del>	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		effects from residual stormwater contaminants, and			
S226 Higgins Contractors	S226.004	Remove the imposition of hydrological controls under (c), or amend wording to have regard to hydrological controls, rather than the imposition of such. Remove requirement of a reduction in contaminant load from stormwater network, or amend to include provisions or small site development discharges.	Neutral	Waste Management agrees that provisions relating to small site development may be effective. Waste Management considers further amendments are required to the policy so remove the reference to 'prohibited' unplanned greenfield activities.	Neutral
S225 Upper Hutt City Council	S225.067	<p>Considers greenfield development has more opportunity to address effects, particularly given space available to incorporate design and infrastructure solutions when compared to constrained urban environments. Notes prohibition in policy, and direction in objective above it, would render a future plan change an impossibility as it wouldn't implement higher order documents. Considers the section 32 analysis would need to consider provisions Plan Change 1 and recent changes to Natural Resources Plan and therefore would be at risk of being contrary to objectives and policies in these plans.</p> <p>Relief sought: Seek that the policy is amended to read: ... "(a) <del>prohibiting managing</del> unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and"</p>	Support	Waste Management agrees that unplanned greenfield development should not be prohibited. Waste Management agrees with the submitters reasoning regarding the opportunities that new development has to mitigate effects of stormwater discharge.	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S222 Environmental Defence Society Inc.	S222.035	Relief sought: Amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities. Support removal of stock from waterbodies and the coastal environment.	Oppose	<p>The submitter's proposed amendment does not recognize that in some instances water quality can be maintained (or enhanced) by mitigation measures and some level of residual effect may be acceptable in some cases. The use of “avoid” is a very high test and would be overly onerous.</p> <p>As per Waste Management's primary submission the approach to prohibiting activities is not supported.</p>	Disallow
S220 Rosco Ice Cream Ltd	S220.010	Amend the policy to restrict discharges from unplanned greenfield development.	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S33 Wellington City Council	S35.005	<p>Concerns regarding the prohibitive provisions framework and if it is the most appropriate to achieve the objectives and policies of the National Policy Statement-Freshwater Management 2020.</p> <p>Relief sought: <del>(a) prohibiting unplanned greenfield development for other greenfield developments minimising the contaminants and requiring contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads</del></p>	Support	<p>Waste Management agrees that unplanned greenfield development should not be prohibited.</p> <p>Waste Management agrees with the submitters concerns regarding the appropriateness of a prohibitive provisions framework to achieve the objectives and policies of the National Policy Statement – Freshwater Management 2020.</p>	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		from urban wastewater and stormwater networks, through stormwater management strategies, and.			
S38 Summerset Group Holdings Limited	S38.005	Delete clause (a).	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S161 Gillies Group Management Ltd	S161.011	<del>(a) prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the contaminants from greenfield developments <del>and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</del>	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S165 S165 Pukerua Holdings Limited	S165.011	<del>(a) prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the contaminants from greenfield developments <del>and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</del>	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S169 Koru Homes NZ Limited	S169.006	<del>a) prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the contaminants from greenfield developments <del>and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</del>	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow
S173 Arakura Plains Development Limited	S173.011	Delete clause (a).	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.	Allow



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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S177 Transpower New	S177.020	<p>Considers policy is inappropriate because definition of "unplanned greenfield development" is broad, uncertain, and could prohibit maintenance, upgrading and development of regionally significant infrastructure. Considers prohibition on unplanned greenfield development is inappropriate and must be removed. If relief sought by submitter on the definition of "unplanned greenfield development" is granted in full, submitter would adopt a neutral position on this aspect of policy.</p> <p>Relief sought: (a) <del>prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the discharge of stormwater contaminants from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor, requiring aquatic offsetting or compensation (which may include financial contributions) as to offset adverse effects from residual stormwater contaminants, and.</p>	Support	<p>Waste Management agrees that unplanned greenfield development should not be prohibited.</p> <p>Waste Management agrees with the submitter's reasoning that the provisions could prohibit regionally significant infrastructure, noting Waste Management considers landfills and resource recovery parks to be regionally significant.</p>	Allow
S206 Winstone Aggregates	S206.036	<p>Considers clause (a) prescribes the activity status of an activity, rather than focusing on an adverse effect. Notes "unplanned greenfield development" may be applied generally, given "greenfield development" is not defined.</p> <p>Relief sought: (a) <del>prohibiting unplanned greenfield development and for other</del></p>	Support	<p>Waste Management agrees that unplanned greenfield development should not be prohibited.</p> <p>Waste Management agrees with the submitters reasoning that the focus should be on adverse effects of an activity rather than the activity itself.</p>	Allow

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		<p><del>greenfield developments</del> minimising the contaminants generated by urban development, and where there are more than minor residual adverse effects caused by stormwater contaminants <del>requiring aquatic offsetting in first instance, which may include a requiring financial contributions as to an aquatic offset adverse effects from residual stormwater contaminants, and.</del></p>			
S207 Firth Industries Limited	S207.008	<p>Clause (a) prescribes the activity status rather than addressing adverse effects which is inappropriate for a policy.</p> <p>Relief sought: (a) <del>prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the contaminants generated by urban development, and where there are more than minor residual adverse effects caused by stormwater contaminants <del>requiring aquatic offsetting in first instance, which may include a requiring financial contributions as to an aquatic offset adverse effects from residual stormwater contaminants, and.</del></p>	Support	<p>Waste Management agrees that unplanned greenfield development should not be prohibited.</p> <p>Waste Management agrees with the reasoning of the submitter insofar as it is inappropriate for a policy to prescribe an activity status.</p>	Allow
S211 Hutt City Council	S211.010	Concerned with the proposed prohibited activity status for unplanned greenfield development; considers that this precludes consenting pathways for development in unplanned greenfield areas which may have positive outcomes. Concerned that minor activities which extend into unplanned greenfield areas would be prohibited.	Support in part	<p>Waste Management agrees that unplanned greenfield development should not be prohibited. Waste Management seeks for unplanned greenfield development to be restricted as per its submission.</p> <p>Waste Management agrees with the submitter's comments and shares concerns</p>	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
		Relief sought: (a) <del>prohibiting</del> avoiding unplanned greenfield development and for managing other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and (b) <del>encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and.</del>		about the preclusion of consenting pathways.	
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.005	Clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by this rule and the appropriate rule category. Submits that the plan change should be amended to provide a more balanced and nuanced approach with regard to managing the tension between restricting urban sprawl and provision for practical flexibility for development in non-urban areas. Amend WH.P2(a) to state: <u>restricting</u> <del>prohibiting</del> unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.	Support	Waste Management agrees that unplanned greenfield development should not be prohibited.  Waste Management agrees that clarity is needed in the application of the policy.	Allow
<b>Policy WH.P16</b>					
S33 Wellington City Council	33.048	Amend policy to allow for Discretionary activity status OR delete policy.	Support	Waste Management considers the policy should be amended to remove the reference to avoid and be replaced with minimise.	
S38 Summerset Group Holdings Limited	S38.009	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
				position on whether the policy should be deleted.	
S96 Urban Edge Planning Group on behalf of M & J Walsh Partnership Ltd	S96.003	<p>Considers proposed policy too narrow due to lack of pathway other than avoidance. Considers effects could be managed.</p> <p>Amend policy to provide pathway where effects of additional stormwater discharged can be managed. Any further changes needed to achieve the intention of this submission.</p>	Support	Waste Management agrees with the submitters comments that the proposed policy by referencing 'avoid' is too narrow to allow other pathways to manage effects.	Allow
S97 Urban Edge Planning Group on behalf of Coronation Real Estate Limited	S97.002	Amend policy to provide pathway where effects of additional stormwater discharged can be managed. Any further changes needed to achieve the intention of this submission.	Support	Waste Management agrees that the focus should be on management of effects and that the focus on avoidance is not appropriate as it precludes pathways such as consent applications.	Allow
S110 Save Our Hills (Upper Hutt) Incorporated	S110.001	Do not allow any new stormwater discharges from unplanned greenfield development where the discharge will enter a surface water body or coastal water, including through an existing local authority stormwater network.	Oppose	<p>The Policy Framework should recognize that in some cases it is possible to mitigate adverse effects associated with stormwater discharge.</p> <p>Waste Management opposes the high level of restriction and prohibited status that flows from the policy for the reasons set out in Waste Management's primary submission.</p>	Disallow
S161 Gillies Group Management Ltd	S161.014	Delete Policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S165 Pukerua Holdings Limited	S165.014	Delete Policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S169 Koru Homes NZ Limited	S169.009	Delete Policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S173 Arakura Plains Development Limited	S173.014	Delete Policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S177 Transpower New Zealand	S177.024	Considers the definition of unplanned greenfield development is too broad and uncertain. Unclear if all development is prohibited or just specific kinds of urban development. Concerns the approach could prohibit works on regionally significant infrastructure.  Relief sought: Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.  Waste Management agrees with the submitter's comments that this approach could prohibit the development of regionally significant infrastructure.	Allow in part
S206 Winstone Aggregates	S206.043	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S207 Firth Industries Limited	S207.016	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral	Allow in part

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Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
				position on whether the policy should be deleted.	
S211 Hutt City Council	S211.015	The policy duplicates WH.P2(a) and is therefore unnecessary.  Delete policy.	Support in Part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S220 Rosco Ice Cream Ltd	S220.013	Amend to a minimisation policy.	Support	Waste Management considers the policy should be amended to remove the reference to avoid.	Allow
S236 Parkvale Road Limited	S236.008	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S241 Pukerua Property Group Ltd	S241.013	Withdraw Plan Change 1. If Plan Change 1 not withdrawn, delete objectives and policies using stormwater controls to manage or prevent land use. If objectives and policies are not deleted, they should be amended to remove avoidance principles and replaced with objectives and policies with same effect/guidance as remainder of Plan Change 1 before notification with perhaps some policy relief for activities that require consent under operative provisions (in force before Plan Change 1).	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management does not agree with complete deletion of Plan Change 1.	Allow in part
S245 Tama Potaka, Minister of Conservation	S245.014	Amend Policies to be consistent with New Zealand Coastal Policy Statement Policy 23.	Neutral	Waste Management does not have a position on the amendment proposed but Waste Management seeks the policy be further amended as per their primary submission.	Allow in part

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S248 Ara Poutama Aotearoa the Department of Corrections	S248.024	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S252 Thames Pacific	S252.011	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S255 Woodridge Holdings Ltd	S255.030	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S251 Peka Peka Farm Limited	S251.007	Delete policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
S257 Kāinga Ora	S257.021	Delete the policy. Alternatively, amend the proposed policy to provide a pathway where the effects from additional stormwater discharges can be managed appropriately. This alternative framework could also incorporate a set of criteria for out of sequence development, which is in line with the direction of the National Policy Statement-Urban Development.	Support in part	Waste Management agrees with the submitters comments regarding allowing a consenting pathway.	Allow in part
S261 Forest & Bird	S261.077	Retain as notified.	Oppose	As per Waste Management primary submission the approach to prohibiting activities is not supported.	Disallow

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S286 Taranaki Whānui	S286.047	Delete the policy.	Support in part	Waste Management considers the policy should be amended to remove the reference to avoid. Waste Management has a neutral position on whether the policy should be deleted.	Allow in part
<b>Rule WH.13</b>					
S286 Taranaki Whānui	S286.077	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S261 Forest & Bird	S261.106	Retain as notified.	Oppose	As per Waste Management's primary submission the approach to prohibiting activities is not supported.	
S257 Kāinga Ora	S257.033	Delete rule. Alternatively, amend activity status and remove consequential requirement for separate Plan Change process, instead incorporating a set of criteria for out of sequence development that is in line with the National Policy Statement – Urban Development. Undertake review of, and expansion to the areas identified as planned/existing urban areas on maps 86- 89. Any further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S255 Woodridge Holdings Ltd	S255.036	Amend so that unplanned greenfield developments areas are a discretionary activity.	Support	Waste Management consider the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.	Allow



## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S252 Thames Pacific	S252.018	Delete rule or if not accepted make a discretionary activity.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S251 Peka Peka Farm Limited	S251.009	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management support the deletion of the rule as per its primary submission.	Allow
S248 Ara Poutama Aotearoa the Department of Corrections	S248.037	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S247 Carrus Corporation Ltd	S247.019	Delete rule or if not accepted make a discretionary activity.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission.	Allow
S245 Tama Potaka, Minister of Conservation	S245.052	Amend rules R2-R13 as appropriate to better give effect to New Zealand Coastal Policy Statement Policy 23(4) matters (a) – (d).	Neutral	Waste Management does not have a position on the amendment proposed but Waste Management seeks the policies and rules be further amended as per its primary submission.	Neutral
S243 Land Matters Limited	S243.030	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management	Allow

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
				supports the deletion of the rule per its primary submission,	
S239 Orogen Limited	S239.008	Reconsider Rules WH.R13 & P.R12, for example, through: -A revised activity status, or -Additional exclusions to the Rule.	Support	<p>Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.</p> <p>Waste Management agrees in some cases a consenting pathway will be appropriate and should not be precluded.</p>	Allow
S225 Upper Hutt City Council	S225.104	Delete rule or amend significantly to change from prohibited and provide a consenting pathway for unplanned greenfield developments. Seek this specifically should not apply to developments feeding into existing stormwater networks that will have an existing stormwater network discharge consent.	Support	<p>Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its original submission and agree with changing activity status if the rule is to remain.</p> <p>Waste Management agrees in some cases a consenting pathway will be appropriate and shouldn't be precluded.</p>	Allow
S220 Rosco Ice Cream Ltd	S220.016	Amend rule WH.R13 to be a non-complying activity.	Support	<p>Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.</p>	Allow
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S.216.006	Change to rule WH.R13 to classify the relevant activity as non-complying instead of prohibited.	Support	<p>Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management</p>	Allow

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
				agrees with changing activity status if the rule is to remain.	
S211 Hutt City Council	S211.022	Amend rule WH.R13 as follows: Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity. The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a non-complying <del>prohibited</del> activity.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain. If this amendment is made, Waste Management would support the amendment of the title to reflect the rule.	Allow
S207 Firth Industries Limited	S207.019	Inappropriate for all development in "unplanned greenfield development areas" to be prohibited activities due to insufficient evidence to substantiate that 'all' development will have significant adverse effects.  Make discretionary activity.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.	Allow
S97 Urban Edge Planning Group on behalf of Coronation Real Estate Limited	S97.003	Replace the prohibited activity status with a discretionary or non-complying activity status. Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management agrees with changing activity status if the rule is to remain.	Allow
S38 Summerset Group Holdings Limited	S38.017	Delete rule.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its original submission.	Allow

## ATTACHMENT 1 – WASTE MANAGEMENT NZ LIMITED FURTHER SUBMISSION ON PC1

Original Submitter Name	Original Submitter Number	Submitter Decision Requested	Position	Reasons	Relief Sought
S33 Wellington City Council	S33.067	Amend rule to discretionary or delete.	Support	Waste Management considers the prohibited activity status does not achieve efficient or effective resource management and is not appropriate. Waste Management supports the deletion of the rule as per its primary submission and agree with changing activity status if the rule is to remain.	Allow

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
  2. You can use the Further Submission Form(s) (Form 6).
    - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
    - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).
- Please send the Further Submission Form in by one of the below methods:
- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
  - Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
  - Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
<b>Name of Submitter:</b> (First and last name, or organisation / company)	Wellington City Council
<b>Address for service:</b> (Email, or physical address) Please note an <u>email address</u> is the preferred method	Michael.Duindam@wcc.govt.nz
<b>Phone:</b> (Optional)	
<b>Contact person for submission:</b> (If different to above)	Michael Duindam
<b>I wish to be heard in support of my submission at a hearing:</b>	Yes
<b>I would consider presenting a joint case at the hearing with others who</b>	Yes

make a similar submission:	
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	N/A
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	N/A
C) I am the local authority for the relevant area.	Yes
Specify the reasoning behind why you qualify for either of these above options:	Submitting on behalf of Wellington City Council

<b>3. For the further submitter to action</b>
<p>Service of your further submission:</p> <p>Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation	yes	08/03/2024
<p><b>Public information:</b> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<b>5. Further Submission:</b>
<ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: <ul style="list-style-type: none"> <li>Suggested added text, shown as <b>bolded text</b> format</li> <li>Suggested deleted text, shown as <del>struckthrough</del> format</li> </ul> </li> </ul>

Please enter further submission points in the table on the following page(s)

I support/oppose the submission of:	The particular part/s of the submission I support/oppose are:			Original Reasons:	Original Decision Requested:	The reasons for my support/opposition are:	I seek that the whole (or part) of the submission be allowed/disallowed:
	Sub no./point no.	Support/oppose	Provision				
S275 The New Zealand Transport Agency	S275.007	Amend	8.2.1 Discharges to water	<p>Considers it unclear if Policy P.P5 and Policy P.P6 are intended to apply to stormwater network discharge points noting that Policy WH.P6 specifically excludes stormwater networks.</p> <p>Considers that stormwater networks are subject to a range of other controls which would address issues identified in P.P5 and P.P6 so should be specifically excluded from these provisions</p>	<p>Specifically exclude stormwater networks from consideration under WH.P5, P.P5 and P.P6 and related provisions (to be consistent with WH.P6).</p> <p>Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.</p>	Consistent with Wellington City Council's position on the matter.	Allow
S275 The New Zealand Transport Agency	S275.010	Amend	Objective P.O3	<p>While NZTA supports the intent behind the reduction in contaminant loads proposed, it is unclear if and how the reduction can be sustained and further information should be provided before such targets are adopted. The Section 32 assessment states "...the economic costs to communities are likely to be significant due to infrastructure upgrade costs [when compared to 'status quo'] (page 162). It is also noted that cost assessments (page 151 and 152) focus on local authority costs, not NZTA costs which seem to have been omitted. The value of investment/forward planning which has already been made through the consent process under the Operative Plan is also not explicitly recognised in the section 32.</p>	<p>Further consideration of the feasibility and costs of these targets. Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.</p>	Consistent with Wellington City Council's position on the matter.	Allow

S275 The New Zealand Transport Agency	S275.019	Oppose	Rule WH.R1:	Considers this rule cannot be complied with as items such as paint and cement are required for the construction and maintenance of structures in the coastal marine area. Considers the prohibited activity status is inflexible and could have unintended consequences as other potentially more harmful substances may have to be used instead.	Delete this rule Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.	Consistent with Wellington City Council's position on the matter.	Allow
S275 The New Zealand Transport Agency	S275.031	Amend	Rule WH.R23	Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rules to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place.  Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.	Consistent with Wellington City Council's position on the matter.	Allow
S275 The New Zealand Transport Agency	S275.034	Amend	Rule WH.R23	Notes the notified version of this rule contained errors which have now been corrected. Considers the rule also needs to be amended to provide for the ability of some sediment and/or flocculant the stormwater network. Considers a limit of no discharge is unworkable without completely isolating the site from the network and treating all sediment / flocculant discharge to 100% is not feasible.	Amend the rules to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place.  Any further alternative or consequential relief as may be necessary to fully achieve the relief sought.	Consistent with Wellington City Council's position on the matter.	Allow
S275 The New Zealand Transport Agency	S275.042	Amend	Schedule 29: Stormwater Impact Assessme nts.	Suggests Schedule 29 should be prefaced with a statement which reflects Schedule 4 of the RMA "...must be specified in sufficient detail to satisfy the purpose for which it is required"	Add prefacing text which indicates that the Stormwater Impact Assessment should be of a scale which reflects the application to which it relates. For example: A stormwater impact assessment shall include the following analysis in sufficient detail to satisfy the purpose for which it is required: Any further alternative or consequential relief as may be necessary to fully achieve the relief sought	Consistent with Wellington City Council's position on the matter.	Allow



S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.006	Amend	Rule WH.R13	Considers a non-complying rule is more appropriate to regulate stormwater discharges which may enter a surface water body or coastal water when the land has not been zoned for urban development.	Change to rule WH.R13 to classify the relevant activity as non-complying instead of prohibited.	Consistent with Wellington City Council's position on the matter.	Allow
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.008	Amend	Rule WH.R13	Considers a non-complying rule is more appropriate to regulate stormwater discharges which may enter a surface water body or coastal water when the land has not been zoned for urban development.	Change to rule WH.R13 to classify the relevant activity as non-complying instead of prohibited.	Consistent with Wellington City Council's position on the matter.	Allow

<p>S216</p> <p>Te Rūnanga o Toa Rangatira (Te Rūnanga)</p>	<p>S216.005</p>	<p>Amend</p>	<p>Policy WH.P2</p>	<p>Considers the intention of Policy WH.P2(a), Policy WH P.P15 and associated provisions is to restrict urban development that is ad hoc and uncoordinated to minimise water quality impacts, lack of stormwater infrastructure and other environmental effects.</p> <p>Supports a dedicated planning approach to development in the Wellington Region. Considers urban sprawl should be avoided when it results in poor environmental outcomes. Considers there a need to clarify the provisions relating to 'unplanned greenfield development' and the type of activities captured by this rule and the appropriate rule category. Notes that Under the Ngāti Toa Rangatira Deed of Settlement Act 2014, land has been returned or acquired by Ngāti Toa Rangatira under the Right of First Refusal or other processes. These lands may involve historical legacy zones or activities which have been inherited from previous owners or land uses, such as former education and corrections facilities. Considers while new development will aim to achieve high standards of wastewater and stormwater disposal in terms of Water Sensitive Urban Design systems, there could be unanticipated challenges relating to existing (historical) infrastructure, buildings and related additions or alterations that may trigger the unplanned greenfield development rule. Considers similar issues may exist for areas where resource consents have been granted for activities in unplanned greenfield development areas but the zoning has yet to reflect existing activity. For example, upgrades to facilities in rural areas that could trigger the unplanned greenfield development rule. Notes this upgrades may not justify the expense and time of a private plan change process. Considers a strong alignment between the provisions of the district plans and NRP is needed when signalling land that may potentially become part of future urban development areas. For</p>	<p>Clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by this rule and the appropriate rule category. Submits that the plan change should be amended to provide a more balanced and nuanced approach with regard to managing the tension between restricting urban sprawl and provision for practical flexibility for development in nonurban areas. Amend WH.P2(a) to state: Restricting prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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				<p>example, the NPR maps 86-89 may become 'out of date' due to district plan reviews. Considers this may require a two plan change process (an update to the relevant maps of the NRP and the district plan zoning).</p>			
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<p>S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)</p>	<p>S216.007</p>	<p>Amend</p>	<p>Policy WH.P2</p>	<p>Considers the intention of Policy WH.P2(a), Policy WH P.P15 and associated provisions is to restrict urban development that is ad hoc and uncoordinated to minimise water quality impacts, lack of stormwater infrastructure and other environmental effects.</p> <p>Supports a dedicated planning approach to development in the Wellington Region. Considers urban sprawl should be avoided when it results in poor environmental outcomes. Considers there a need to clarify the provisions relating to 'unplanned greenfield development' and the type of activities captured by this rule and the appropriate rule category. Notes that Under the Ngāti Toa Rangatira Deed of Settlement Act 2014, land has been returned or acquired by Ngāti Toa Rangatira under the Right of First Refusal or other processes. These lands may involve historical legacy zones or activities which have been inherited from previous owners or land uses, such as former education and corrections facilities. Considers while new development will aim to achieve high standards of wastewater and stormwater disposal in terms of Water Sensitive Urban Design systems, there could be unanticipated challenges relating to existing (historical) infrastructure, buildings and related additions or alterations that may trigger the unplanned greenfield development rule. Considers similar issues may exist for areas where resource consents have been granted for activities in unplanned greenfield development areas but the zoning has yet to reflect existing activity. For example, upgrades to facilities in rural areas that could trigger the unplanned greenfield development rule. Notes this upgrades may not justify the expense and time of a private plan change process. Considers a strong alignment between the provisions of the district plans and NRP is needed when signalling land that may potentially become part of future urban development areas. For</p>	<p>Clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by this rule and the appropriate rule category. Submits that the plan change should be amended to provide a more balanced and nuanced approach with regard to managing the tension between restricting urban sprawl and provision for practical flexibility for development in nonurban areas. Amend WH.P2(a) to state: Restricting prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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				example, the NPR maps 86-89 may become 'out of date' due to district plan reviews. Considers this may require a two plan change process (an update to the relevant maps of the NRP and the district plan zoning).			
S240 Porirua City Council	S240.001	General comments - definitions	Not Stated	Considers a definition of 'urban environment' is required in place of 'urbanised area' in various proposed provisions to provide greater regulatory certainty.	Insert definition for Urban Environment:  Has the same meaning as given in section 1.4 of the National Policy Statement for Urban Development 2020.	Consistent with Wellington City Council's position on the matter.	Allow
S240 Porirua City Council	S240.008	General comments - overall	Not Stated	Considers the PDF format of PC1 and the NRP, with no hyperlinked definitions and with A4 maps in appendices, is out of step with current technology and best practice where plans are presented in digital formats. Considers converting PC1 and the NRP to an eplan format will improve regulatory compliance and reduce costs through time savings for plan users	Request that Greater Wellington convert both the PC1 and the NRP to an eplan format as soon as practicable to enable plan users to efficiently find information	Consistent with Wellington City Council's position on the matter.	Allow

S240 Porirua City Council	S240.016	6 Other methods	Amend	<p>Supports action plans to achieve objectives and considers action plans should be developed in partnership with territorial authorities rather than being informed by them. Working in partnership would reflect the long-term partnership approach taken under the Harbour Strategy and Action Plan between councils and Ngāti Toa. Considers the s32 evaluation of Council feedback on this point at pre-notification consultation has not addressed this concern and does not make sense, as Method M36 seeks to direct a partnership with mana whenua (submitter references paragraph 51 of Part A of the s32 report). Considers Council is a key stakeholder as a regulator, land owner and asset owner and an action plan developed in partnership with Council is more likely to be successful.</p>	<p>Amend the method so that territorial authorities are partners to development and delivery of action plans: Method M36: Freshwater Action Plan programme Wellington Regional Council will implement a programme to prepare, deliver, monitor and review Freshwater Action Plans for all part Freshwater Management Units identified in Schedule 27. Freshwater Action Plans will be:</p> <p>(a) developed in partnership with mana whenua <b>and territorial authorities</b>, and be informed by engagement with catchment communities, <del>territorial authorities</del> and stakeholders, and (b) prepared and published for all Freshwater Management Units and/or part Freshwater Management Units in the Wellington region by December 2026, and (c) prepared for all attributes identified in Schedule 27 A2. Freshwater Action Plans may also be prepared for, or incorporate, actions for any other relevant target attribute state or environmental outcome identified in partnership with mana whenua or with the community. Wellington Regional Council, in partnership with mana whenua <b>and territorial authorities</b>, and informed by engagement with catchment communities, <del>territorial authorities</del> and stakeholders, may make changes or additions to any Freshwater Action Plan, at any time, for the purpose of achieving the target attribute states and/or environmental outcomes set in this Plan.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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S240 Porirua City Council	S240.027	Table 9.1: Coastal water objectives	Amend	<p>Concerned about the 12-14% increased cost per year to ratepayers to meet the 2040 E.coli limit (as stated in the s32 report) on top of BAU rates increases of between 10-30% and the affordability of this for ratepayers. Considers the 2060 target of 6-7% is more achievable provided other funding avenues are explored, including growth charging and debt funding. Notes significant central government funding will also be required. Considers the numbers do not take into account debt affordability and availability with Local Government Funding Agency Covenants. Considers that repairing the public network would only reduce a proportion of the contaminant load and there are known issues with private laterals that make up half the network by length and a significant portion of untreated discharges to land and water. Notes costs that would fall on landowners to upgrade pipes within the private network are not figured into the s32 Evaluation, and these investments would be substantial to meet the 2040 target. Considers laterals on private property are the responsibility of the landowner, and they must bear the costs to fix them when faulty rather than the ratepayer. Concerned about the practical administrative issues of Council undertaking the work, or funding it upfront with cost recovery. Considers costs to address these issues could be between \$10,000 to \$20,000 per property or more with Wellington Water's high level indicative estimates between \$250 - 350 million. Considers the impact of the above funding requirements on housing and business development capacity is not sufficiently explored in the s32 Evaluation.</p>	Amend the timeframe for target states for E.coli and enterococci coastal water objectives to 2060.	Consistent with Wellington City Council's position on the matter.	Allow
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S240 Porirua City Council	S240.031	Table 9.2: Target attribute states for rivers	Amend	<p>Concerned about the 12-14% increased cost per year to ratepayers to meet the 2040 E.coli limit (as stated in the s32 report) on top of BAU rates increases of between 10-30% and the affordability of this for ratepayers. Considers the 2060 target of 6-7% is more achievable provided other funding avenues are explored, including growth charging and debt funding. Notes significant central government funding will also be required. Considers the numbers do not take into account debt affordability and availability with Local Government Funding Agency Covenants. Considers that repairing the public network would only reduce a proportion of the contaminant load and there are known issues with private laterals that make up half the network by length and a significant portion of untreated discharges to land and water. Notes costs that would fall on landowners to upgrade pipes within the private network are not figured into the s32 Evaluation, and these investments would be substantial to meet the 2040 target. Considers laterals on private property are the responsibility of the landowner, and they must bear the costs to fix them when faulty rather than the ratepayer. Concerned about the practical administrative issues of Council undertaking the work, or funding it upfront with cost recovery. Considers costs to address these issues could be between \$10,000 to \$20,000 per property or more with Wellington Water's high level indicative estimates between \$250 - 350 million. Considers the impact of the above funding requirements on housing and business development capacity is not sufficiently explored in the s32 Evaluation.</p>	Amend the timeframe for target states for E.coli and enterococci coastal water objectives to 2060.	Consistent with Wellington City Council's position on the matter.	Allow
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S240 Porirua City Council	S240.046	Policy P.P15	Oppose	Considers there is an insufficient evidence base to support the approach being taken, especially considering that there is a prohibited activity status associated with new unplanned greenfield development. Considers that a consenting pathway is required through a non-complying activity status to avoid any unintended consequences that may result through taking a prohibited approach. Considers this policy directly duplicates P.P2(a) and is therefore unnecessary.	Delete Policy P.P15	Consistent with Wellington City Council's position on the matter.	Allow
S240 Porirua City Council	S240.074	Rule P.R16	Amend	Supports in principle the reduction of sediment discharges from forestry but considers there is a need to provide for the creation of firebreaks as a permitted activity to allow people to defend their homes and property from the risk of wildfires.	Rule P.R16: Vegetation clearance on highest erosion risk land - permitted activity Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met: (a) the vegetation clearance is: (i) to implement an action in the erosion risk treatment plan for the farm, or (ii) for the control of pest plants, or (iii) for the creation or maintenance of a firebreak; and (b) debris from the vegetation clearance is not placed where it can enter a surface water body.	Consistent with Wellington City Council's position on the matter.	Allow

S151 Wellington Water Ltd	S151.001	General comments - stormwater management	Amend	Concerned the PC1 policies and rules are not sufficiently enabling, and in some instances are not feasible to implement.	Amend policies and rules to: Clearly provide for stormwater and wastewater discharges from local authority networks as a restricted discretionary activity, without this status being jeopardised by subjective assessments of the merits of the SMS or WNCIS, or noncomplying activity rules in other parts of the NRP. Provide guidance on the matters to be considered in prioritising sub-catchments for improvement works, while also ensuring sufficient flexibility to take account of practical matters such as investment availability and efficiencies and alignment with other workstreams (including wastewater improvement works). Allow matters of detail to be specified in sub-catchment SMPs and SIPs, rather than in the initial SMS and WNCIS. Provide flexibility for determining the load reductions required in order to appropriately contribute to meeting the TAS (in light of our present concerns with the TAS, lack of information as to baseline states in many cases, and the uncertainty around the 'commensurate reduction' wording and whether this is realistic (i.e. properly within Wellington Water's control) for all attributes). Provide for dry weather discharges (such as dry weather overflows and exfiltration) to be managed via a 'responsive management approach' rather than with reference to the TAS (due to the current inability to forecast dry weather overflows or assess the correlation between dry weather discharges within the control of Wellington Water and TAS being achieved). Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow
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S151 Wellington Water Ltd	S151.003	General comments - target attribute states	Oppose	<p>Opposes the provisions relating to TAS and Coastal Water Objectives (CWO) in full. Considers there is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. Considers the CWO in Table 8.1 are generally appropriate parameters for coastal environmental health, but concerned the lack of information relating to baseline states and timeframes to meet requirements makes it difficult to determine whether improvement is measurable. Considers it is unclear how the TAS and CWO provisions will be assessed and measured. Considers the provisions do not currently recognise the complexities and contributing factors for achieving TAS and that meeting TAS for network discharges cannot wholly sit with Wellington Water as there are many factors within catchments that contribute to water quality, and the provisions do not reflect the magnitude of work involved in delivering water quality improvement. Considers the uncertainty and lack of information in the provisions regarding the baseline state means that Wellington Water cannot undertake a full assessment of the potential impact that the TAS/CWO provisions will have on their discharge consent applications and the prioritisation and implementation of sub-catchment improvements. Considers it is likely that the TAS 2040 timeframe (particularly as it relates to E. coli), will result in the requirement for a large proportion of subcatchments (or possibly all of them) to be upgraded in the short term. As such, undertaking a prioritisation exercise and implementing the subcatchment management plans for stormwater and wastewater could be rendered meaningless. This is unlikely to allow for progressive improvement, or for practicable implementation. Seeks further discussions with Greater Wellington on this matter,</p>	<p>The plan change include guidance or provisions that outline how proportional contribution to meeting the TAS can be demonstrated, and more realistic timeframes in the relevant TAS tables. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	Allow
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				particularly around a more detailed assessment of the implications of the TAS and CWO provisions on a sub-catchment basis and a clear understanding of how these would be addressed in a resource consent application.			
S151 Wellington Water Ltd	S151.004	General comments - target attribute states	Oppose	Considers the scale and volume of work necessary between now and 2040 to achieve the necessary reduction in wet weather wastewater overflows, dry weather wastewater discharges and stormwater contamination is significant. Retrofitting the urban areas of four cities to also address environmental outcomes will take decades of planning, designing and construction. Acknowledges this work needs to be done but 17 years (between now and 2040) is insufficient to achieve this. Considers that delivery of the network discharges programme at such a fast pace will impact on delivery of other important work programmes for Te Mana o te Wai such as storage lakes for drinking water supply to support increased minimum flows, wastewater treatment plant upgrades and the renewals programmes for both wastewater and water supply.	Amend all timeframes associated with TAS from 2040 to 2060. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow

S151 Wellington Water Ltd	S151 Wellington Water Ltd	General comments - stormwater management	Amend	<p>Supports the recognition of the role of modelling in PC1 as an analytical tool, including to assess the performance of the wastewater and stormwater networks and compliance with associated consent requirements. Considers PC1 will require Wellington Water to undertake significantly more modelling than it already does which in some cases will be onerous with no additional benefit in predicting load reductions or E. coli reductions. Notes Schedule 32 appears to require the full wastewater network to be modelled as part of preparing the WNCIS but considers this will not improve the understanding of overflows beyond that provided by the current 'Strategic Model'. Concerned requiring SMS be guided by modelling and monitoring will place an unreasonably high burden on consent holders. Considers that any receiving environment modelling should be undertaken by Greater Wellington, including state of the environment modelling which is required to ascertain the baseline state for identified attributes. Notes PC1 repeatedly refers to modelling of load as well as concentration of contaminants (WH.P19 and P.P18 )but concentration cannot be easily or accurately modelled, and would not provide valuable insight. Considers the focus should be on modelling and managing contaminant load, not concentrations. Notes Wellington Water can undertake modelling for contaminant loads and is looking into models such as the 'Contaminant Load Model' (CLM) and 'Medusa' for that purpose, but ascertaining the load reductions necessary to achieve (or contribute to achieving) the TAS will also require the use of receiving environment models such as the 'Fresh Water Management Tool' (FWMT), which is a project that should be undertaken by Greater Wellington. Notes Wellington Water is also not able to model E. coli or enterococci concentrations or load, and instead must use</p>	<p>PC1 be amended to remove unnecessary modelling requirements which are currently to be undertaken by the consent holder; Greater Wellington be responsible for all state of the environment modelling; and Reference to modelling 'concentrations' are removed. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequentia</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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				the wet weather discharge frequency as a proxy for this.			
S151 Wellington Water Ltd	S151.021	High risk industrial or trade premise	Amend	Notes discharges from these premises are excluded from the local authority stormwater network rules (WH.R9 and P.R8) and seeks changed to better align with Wellington Water's areas of control.	Amend this definition or add a note to ensure it includes: 1) sites in relation to which the relevant stormwater discharge consents have not been granted and/or applied for, and 2) sites that have been used for the listed purposes in the past, and still generate contaminants in stormwater, but which are not currently used for any of those purposes Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow
S151 Wellington Water Ltd	S151.025	Stormwater catchment or subcatchment	Amend	Considers the definition is confusing as it is not clear whether the definition includes (or should expressly include) areas where stormwater is discharged to land or groundwater or what 'in the same vicinity' means. Questions whether reference to maps would be more effective.	Revise the definition for clarity. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow

S151 Wellington Water Ltd	S151.056	Objective WH.O3	Oppose	<p>Seeks the timeframe be altered to 2060 as the 2040 timeframe will render prioritisation of subcatchments for improvement or upgrade meaningless and 17 years is considered insufficient to achieve required outcomes. Considers the CWO contained in Table 8.1 are generally appropriate parameters for coastal environmental health, but notes the lack of information relating to baseline states for Coastal Water Management Units and timeframes to meet the requirements makes it difficult to determine whether improvement can be measured (refer also Section A of submission). In clause (b) 'high contaminant concentrations' should be better defined to clarify the work involved and when this clause is relevant. Considers where improvement is required for the Coastal Water Objectives, the requirement should be that the Objective has been achieved or meaningful progress has been made - similar to clause WH.O2(a). Considers clauses (g) and (h) need to be combined or better distinguished.</p>	<p>Provide further detail in relation to the baseline states and required timeframes in both this objective and Table 8.1. Provide maps showing locations of high contaminant concentrations. Amend objective to provide this further detail. In addition to the above, amend as follows: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained, or improved or meaningful progress has been made towards improvement to achieve the coastal water objectives set out in Table 8.1, and by 2040 2060. Define 'high contaminant concentrations' in clause (b) Combine or better distinguish clauses (g) and (h) Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	Allow
S151 Wellington Water Ltd	S151.059	Objective WH.O9	Amend	<p>Refers to Section A of submission for additional context regarding prioritisation and target attribute states, and comments on Table 8.4. Considers Clause (a) needs to refer to 'meaningful progress' as specified by WH.O2(a). Considers Clause (d) Huangā needs to refer to Schedule B to provide certainty for applicants and notes there appears to be a typo .</p>	<p>Revise clause (a) as follows: 'where a target attribute state in Table 8.4 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 8.4, or meaningful progress has been made and' Link huanga with Schedule B and improve wording. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	Allow

S151 Wellington Water Ltd	S151.080	Policy WH.P10	Amend	Notes that for clause (a), 'maximise' already has a practicability component to it in the definitions.	Amend policy as follows: (a) using source control to minimise contaminants in the stormwater discharge and maximise, to the extent practicable, the removal of contaminants from stormwater, including through the use of water sensitive urban design measures, and  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow
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S151 Wellington Water Ltd	S151.082	Policy WH.P13	Amend	<p>Refers to overarching Section A of submission, particularly in relation to prioritisation, TAS, modelling and monitoring. Supports the focus on copper and zinc in clause (a) Considers the reference to concentrations in clause (b) should be deleted.</p> <p>Considers the range of target attribute states in clause (c) is too wide and creates uncertainty. Considers clause (e) should focus on modelling to determine the necessary copper and zinc load reduction in stormwater discharges Opposes the stormwater network modelling component of clause (e), noting WWL will not model the network in its entirety ahead of starting work on subcatchments. Seeks the deletion of reference to concentrations. States there is no point running a CLM model after implementation because it will provide the same information as preimplementation. Opposes the requirement in (e) to monitor concentrations in network discharge as concentrations are more relevant for receiving waters and loads are more appropriate for network discharges. Considers it unclear how the prioritisation component of (e) will align with clause (f). Considers the prioritisation in Clause (f) is meaningless and it is unclear how clauses (e) and (f) would interact. Notes the plan uses different terms that mean the same thing and it is unclear whether these terms are intended to be applied in the same way, for example, in this policy: (i) 'Contribute to' (ii) 'Supporting the achievement of' Considers the policy should be specific regarding which Target Attribute States need to be addressed by the SMS and so seeks clause (c) be deleted.</p>	<p>Amend policy as follows: Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (b) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (c) supporting the achievement of any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci, and (d) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whitua), and (e) monitoring and modelling the stormwater network to identify catchments to be prioritised, the copper and zinc concentrations and loads in the discharge, and changes in discharge volume and quality over time following improvements in the network infrastructure, and (f) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule A (outstanding water bodies) or Schedule C (mana whenua) sites, or mahinga kai. Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (b) reducing the contaminant loads of copper and zinc from discharges to</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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					<p>surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (c) supporting the achievement of relevant target attribute states or coastal water objectives for nutrients and E. coli or enterococci, and (d) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whitua), and (e) modelling the copper and zinc loads in the discharge, and (f) in order to implement the objectives and policies of the Regional Plan, prioritising the improvement of discharges in stormwater subcatchments using a methodology to be set out in a Stormwater Management Strategy prepared in accordance with Schedule 31, that will include engagement with mana whenua and take into account: i. Schedule A (outstanding water bodies) ii. Schedule C (sites with significant mana whenua values) iii. Schedule F (Ecosystems and habitats with significant indigenous biodiversity) iv. Schedule H (contact recreation and Māori customary use) v. Map 85 (Primary contact sites - Te Whanganuia-tara) vi. impacts on group drinking water supplies or community drinking water supplies vii. efficiency and alignment with other work programmes, including work in accordance with a wastewater network catchment improvement strategy or sub-catchment improvement plan; viii. investment availability ix. public health effects x. modelling results xi. effects on the environment.</p>	
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					Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.		
S151 Wellington Water Ltd	S151.086	Policy WH.P18	Oppose	Considers the purpose of policy is unclear and it implies that wastewater networks are the only source of e coli. Refers to comments on prioritisation in Section A of submission.	Delete Policy  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow
S151 Wellington Water Ltd	S151.090	Rule WH.R1	Amend	Supports the intent of this rule and associated policy but concerned about how it may impact on stormwater and wastewater discharges.	Add new clause to the end of the existing rule as follows:... Noting that this rule does not apply to the discharge of contaminants collected as part of stormwater management as a result of precipitation or part of the operation of the wastewater network.  OR as alternative relief, define "point source discharge" so as to exclude discharges from the stormwater wastewater networks  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow

S151 Wellington Water Ltd	S151.103	Objective P.O3		Considers CWO contained in Table 9.1 are generally appropriate parameters for coastal environmental health but the lack of information relating to baseline states for Coastal Water Management Units and timeframes to meet the requirements makes it difficult to determine whether improvement can be measured. Unclear how 'maintain or improve' operates for the objectives that don't have a value. Suggests timeframe should refer to 2060 because many ecosystems or habitats will take a long time to recover. 2040 doesn't allow for that recovery time. Refer to Section A of submission regarding Target Attribute States, prioritisation and deliverability. i Suggests the wording 'meaningful progress' would be more appropriate.	Provide further detail in relation to the baseline states and required timeframes in both this objective and Table 8.1. Provide maps showing locations of high contaminant concentrations and amend objective to provide this further detail. In addition to the above, amend as follows: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained, or meaningful progress has been made towards improvement or improved to achieve the coastal water objectives set out in Table 8.1, and by 2040 2060. Better define 'high contaminant concentrations' in clause (b) Combine or better distinguish clauses (g) and (h) Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow
S151 Wellington Water Ltd	S151.106	Objective P.O6	Amend	Considers clause (a) needs to refer to 'meaningful progress' to reflect the reality of how long it will take to deliver improvements and for ecosystems to recover. Refers to submission points on prioritisation, Target Attribute State, and deliverability in Section A of submission, and submission points on Table 9.2 and submission points on Table 8.4. Suggests in clause (d), Huanga needs to refer to Schedule B to provide certainty for applicants	Revise Clause (a) as follows: 'where a target attribute state in Table 9.2 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 9.2, or meaningful progress has been made, and'  Link huanga with Schedule B. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Consistent with Wellington City Council's position on the matter.	Allow

S151 Wellington Water Ltd	S151.116	Policy P.P12	Amend	<p>Supports the focus on copper and zinc in clause (a). Seeks the deletion of the reference to concentrations in clause (c). Considers the range of target attribute states in clause (d) is too wide and creates uncertainty. Opposes the stormwater network modelling component of clause (e), noting WWL will not model the network in its entirety ahead of starting work on subcatchments, and oppose the requirement to monitor concentrations in discharges, considers concentrations more relevant for receiving waters, and loads appropriate for discharges. Considers clause (f) should focus on modelling to determine the necessary copper and zinc load reduction in stormwater discharges and considers there is no point running a CLM model after implementation because it will provide the same information as pre-implementation. Considers the plan sets many different priorities in different provisions making the prioritisation in clause (g) meaningless and it is unclear how clauses (f) and (g) would interact. Notes the plan uses different terms that mean the same thing and it is unclear whether these terms are intended to be applied in the same way, for example, in this policy: (i) 'Contribute to' (ii) 'Supporting the achievement of' Refers to overarching Section A of submission, particularly in relation to prioritisation, TAS, modelling and monitoring</p>	<p>Amend policy as follows:</p> <p>Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy</p> <p>Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to the coastal water management units of Onepoto Arm and Pāuatahanui Inlet in Map 82 and the harbour arm catchments in Map 84 by 15% for copper and 40% for zinc to contribute to meeting the target attribute states and coastal water objectives for copper and zinc in the Onepoto Arm and Pāuatahanui Inlet of Te Awarua-o-Porirua, and (b) reducing the copper and zinc loads in discharges to the Open Coast coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (c) reducing the concentration and contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (d) supporting the achievement of any other relevant target attribute states or coastal water objectives including for ecosystem health, nutrients, visual clarity and Escherichia coli or enterococci, and (e) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whaitua), and (f) monitoring and modelling the stormwater network to identify catchments to be prioritised, the copper and zinc concentrations and loads in the discharge, and changes in discharge volume and quality over time following improvements in the network</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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					<p>infrastructure, and (g) prioritising the reduction, removal, and/or treatment of stormwater discharges to Schedule A (outstanding water bodies) or Schedule C (mana whenua) sites, or mahinga kai.</p> <p>Stormwater discharges from local authority and state highway networks shall be managed by: (a) reducing the copper and zinc loads in discharges to the coastal water management units of Onepoto Arm and Pāuatahanui Inlet in Map 82 and the harbour arm catchments in Map 84 by 15% for copper and 40% for zinc to contribute to meeting the target attribute states and coastal water objectives for copper and zinc in the Onepoto Arm and Pāuatahanui Inlet of Te Awarua-oPorirua, and (b) reducing the copper and zinc loads in discharges to the Open Coast coastal water management units to contribute to meeting the coastal water objectives to maintain or improve, and (c) reducing the contaminant loads of copper and zinc from discharges to surface water bodies in order to maintain, and in degraded part Freshwater Management Units improve, the water quality state for dissolved copper and zinc to contribute to meeting the target attribute states in those part Freshwater Management Units, and (d) supporting the achievement of relevant target attribute states or coastal water objectives for nutrients and E. coli or enterococci, and (e) implementing a stormwater management strategy and stormwater management plans prepared in accordance with the information and requirements set out in Schedule 31 (stormwater strategy - whitua), and (f) modelling the copper and zinc loads in the discharge, and (g) in order to implement the objectives and policies, prioritising the improvement of discharges in stormwater sub-catchments using a methodology to be set out in a Stormwater Management Strategy prepared in accordance with Schedule 31, that will include engagement with mana whenua and take into account: i. Schedule A</p>	
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					(outstanding water bodies) ii. Schedule C (sites with significant mana whenua values) iii. Schedule F (Ecosystems and habitats with significant indigenous biodiversity) iv. Schedule H (contact recreation and Māori customary use) v. Map 85 (Primary contact sites - Te Whanganuia-tara) vi. impacts on group drinking water supplies or community drinking water supplies vii. efficiency and alignment with other work programmes including work in accordance with a wastewater network catchment improvement strategy or sub-catchment improvement plan viii. investment availability ix. public health effects x. modelling results xi. effects on the environment.  Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.		
S151 Wellington Water Ltd	S151.130	Rule P.R22	Amend	Notes earthworks activities undertaken by Wellington Water with minor effects would be unable to meet the permitted activity conditions of proposed Rule WH.R22 including minor repairs and maintenance of three waters infrastructure. Notes that this proposed rule may mean that hundreds of resource consent applications would be required per annum for minor earthworks activities associated with burst pipe repairs.	Amend Rule to reinstate the exemptions for certain earthworks activities as exist for 'other Whaitua', including for the thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and for the construction, repair, upgrade or maintenance of pipelines. Any consequential amendments, to other relevant provisions, which are in general accordance with this request.	Consistent with Wellington City Council's position on the matter.	Allow
S151 Wellington Water Ltd	S151.142	Schedule 31	Amend	Clause 9: Considers community engagement is too onerous and should not be a requirement.	Delete reference to 'community' from clause 9. Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.	Inconsistent with Wellington City Council's position on the matter	Disallow
S225 Upper Hutt City Council	S225.004	General comments - consultation	Not Stated	Not stated	Seek further work and consultation is undertaken in partnership with territorial authorities to accurately reflect roles and function in achieving outcomes and aspirations of Whaitua documents;	Consistent with Wellington City Council's position on the matter	Allow

S225 Upper Hutt City Council	S225.013	General comments - overall	Not stated	Not stated	Amend timeframes in NRP to give reasonable timeframes to implement new direction for landowners, ensure these are reasonable and achievable and where practicable, funded from external sources;	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.014	General comments - urban development	Not stated	Not stated	Delete provisions prohibiting urban expansion beyond existing urban zoned land, particularly where this does not align with recent rezoning notified before this plan change;	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.015	General comments - stormwater management	Oppose	Not stated	Delete or significantly amend hydrological controls for all development, which are going beyond hydraulic neutrality, as these are unclear and seem to be overly onerous;	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.021	General comments - overall	Amend	Not stated	Seek amendment to delete references to Wellington Water throughout plan change and refer instead to water entities.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.041	Redevelopment	Oppose	Concerned about implications definition may have on business-as-usual activities undertaken by territorial authorities and infrastructure providers. Concerned inclusion of existing roads and 'replacement' or 'reconstruction' is overly onerous given end state of the environment and effects remaining the same. Considers it egregious to require 'like for like' replacements and renewals, which are often required for ongoing function of public goods, to be considered in the same vein as full redevelopments of brownfield sites.	Seek that more than minor maintenance and renewals activities are a permitted or controlled activity and this is effectively reflected in definition of redevelopment.	Consistent with Wellington City Council's position on the matter	Allow



S225 Upper Hutt City Council	S225.058	6. Other methods	Amend	Concerned that this is unclear if territorial authorities are being consulted on funding opportunities or expected to financially contribute.	Amend for clarity noting that territorial authority's already have stretched budgets that are unlikely to be able to fund works not already anticipated in the long term plan processes.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.067	Policy WH.P2	Oppose	Opposes prohibition of development, as it limits options to give effect to NPS-UD and overrides District Plan changes and reviews currently underway or proposed in future. Considers greenfield development has more opportunity to address effects, particularly given space available to incorporate design and infrastructure solutions when compared to constrained urban environments. Notes prohibition in policy, and direction in objective above it, would render a future plan change an impossibility as it wouldn't implement higher order documents. Considers the section 32 analysis would need to consider provisions PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans.	Seek that the policy is amended to read: ... "(a) <del>prohibiting</del> <b>managing</b> unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and"	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.076	Policy WH.P13	Amend	Supports intent to improve water quality through managing stormwater contaminants, however, considers cost implication of policy needs to be funded	Retain as notified except seek that "and/or" used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate. Support councils with funding.	Consistent with Wellington City Council's position on the matter	Allow

S225 Upper Hutt City Council	S225.081	Policy WH.P19	Amend	Supports intent, but is concerned the cost will fall on ratepayers. Considers this requires significant thought and consultation with territorial authorities and their communities around costs. Considers lack of clarity in provision and others throughout PC1 fails to follow basic section 32 processes in development of PC1, which require identification of implications of provisions, a thorough cost and benefit analysis of provisions, and whether these are the more appropriate provisions to achieve outcomes, including an identification of who would be responsible for the implementation of requirements and the implications on those parties	Seek that consultation is undertaken with territorial authorities and their communities, and that the timeframes are realistic and achievable within the resource constraints of Councils and their communities. Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.091	Policy WH.P29	Amend	Considers these are all reasonable things to include as conditions of consents for larger projects, but may not be reasonable for small scale projects such as the maintenance of driveways and footpaths, which are now considered earthworks, in accordance with amended definition.	Amend to clearly identify scale or threshold this policy should apply at.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.094	Rule WH.R1	Oppose	Concerned with: - lack of thresholds or scope of rule application - lack of specificity - some vehicle cleaning products are biodegradable and less harmful to the environment than others - fundamental inability to monitor against this rule - some of these in small quantities may be suitable for discharging to land, e.g. biodegradable cleaning products, cooking oil. As written, means that washing any car or washing house windows or walls would be a prohibited activity. Should a car fail, such as a boiled radiator or oil leak, this would also be a prohibited activity. Considers prohibited activities need to be clear and measurable without any need for interpretations and appears this rule has not been fully considered - particularly as to its purpose, applicability and practical (and reasonable) implementation.	Delete or significantly rewrite to a more specific and reasonable approach. If a rule like this is retained, seek a more permissive activity status such as restricted discretionary. However, we note that it is impractical to require consent for these small scale activities, such as washing windows. If retained, this rule needs further consideration.	Consistent with Wellington City Council's position on the matter	Allow

S225 Upper Hutt City Council	S225.104	Rule WH.R13	Oppose	Concerns with the implications and practicality of this rule and identifies that prohibition in policy, and the direction in objective above it, would effectively render a future plan change an impossibility because it would not be implementing higher order documents. Section 32 analysis for such a plan change would need to consider provisions in PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans.	Delete rule or amend significantly to change from prohibited and provide a consenting pathway for unplanned greenfield developments. Seek this specifically should not apply to developments feeding into existing stormwater networks that will have an existing stormwater network discharge consent.	Consistent with Wellington City Council's position on the matter	Allow
S225 Upper Hutt City Council	S225.107	Rule WH.R23	Oppose	Concerns with implications of amending earthworks definition, and implications for this rule. Considers clause 16 changes to the provision significantly improve outcomes for landowners and public, but submitter remains of the opinion the removal of exclusions from definitions of earthworks, significantly affect submitters ability to undertake business as usual maintenance and renewals particularly for local authority roads, footpaths and cycle paths. Considers it more appropriate to include these activities as permitted activities, given their effects are well understood, and can be managed by permitted activity standards	Amend provisions to address the following key functions of territorial authorities as road controlling authorities: 1. need to cover road maintenance and upgrading, including reseal 2. upgrading of underground networks 3. replacement of signs and traffic/speed management 4. repair, maintenance and upgrading of pedestrian and cycle facilities  Seek that and/or used throughout this document be amended to clarify whether it is inclusive or not as and/or is inappropriate.	Consistent with Wellington City Council's position on the matter	Allow
S286 Taranaki Whānui	S286.002	General comments - definitions	Not stated	Seeks a definition of papakāinga is required as consequential amendment to provide for relief sought in relation to enabling papakāinga activities.	Add definition for Papakāinga: <b>Any activity undertaken in the traditional rohe of tangata whenua to sustain themselves, which is on land held under Te Ture Whenua Māori Act 1993, or on land where there is an ancestral connection to the land and the land will remain in Māori ownership in the long term. Papakāinga includes residential activities and commercial activities that provide employment and / or income to support those living in the papakāinga as well as (but not be limited to): social, cultural, economic, conservation and recreation activities, marae, wāhi tapu and urupā.</b>	Consistent with Wellington City Council's position on the matter	Allow

S286 Taranaki Whānui	S286.004	General comments – unplanned greenfield development	Not stated	Concerns unplanned greenfield areas and associated provisions will impose significant costs and impact ability of Taranaki Whānui whānau to develop ancestral lands. Notes land not yet returned to Māori ownership through treaty settlements, includes many sites in areas mapped as "unplanned greenfield land" including rural and open space land. Considers prohibition on developing these lands inconsistent with principles of Te Tiriti.	Freshwater effects of development of these sites are addressed through a regional consent process rather than a regional plan change	Consistent with Wellington City Council's position on the matter	Allow
S286 Taranaki Whānui	S286.005	General comments - overall	Not stated	Concerned additional rules for stormwater management would create additional barriers to develop land for long-term benefit of Taranaki Whānui uri through Papakāinga.	Not stated	Consistent with Wellington City Council's position on the matter	Allow
S286 Taranaki Whānui	S286.062	Policy WH.P31	Amend	Supports intent to avoid winter earthworks, but considers this issue can be addressed through consent conditions on an earthworks consent rather than requiring a separate consent.	Delete policy: Policy WH.P31: Winter shut down of earthworks Earthworks over 3,000m2 in area shall: (a) be shut down from 1st June to 30th September each year, and (b) prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021).	Consistent with Wellington City Council's position on the matter	Allow

S286 Taranaki Whānui	S286.077	Rule WH.R13	Oppose	Concerned policy and provisions will impose significant costs and impact the ability of Taranaki Whānui whanau to develop their ancestral lands. Notes land not yet returned to Māori ownership through treaty settlements, includes many sites in areas mapped as "unplanned greenfield land" including rural and open space land. Considers prohibition on developing these lands inconsistent with principles of Te Tiriti and inconsistent with need to provide for broader housing affordability and innovation on both Māori and all other land. Considers planning processes need to be flexible to ensure aspirational outcomes are achieved. Seeks freshwater effects of development of these sites are addressed through a regional consent process rather than a regional plan change	Delete rule.	Consistent with Wellington City Council's position on the matter	Allow
S211 Hutt City Council	S211.003	General comments - target attribute states	Amend	Considers repair and upgrading the public network would only reduce a proportion of the contaminant load and there will be substantial costs to landowners to upgrade pipes (private laterals) within the private wastewater network that make a significant portion of untreated discharges to land and water, to meet the proposed 2040 target. Notes Wellington Water's concern in relation to the ability to deliver the work required to meet the 2040 target.	Amend the proposed 2040 E.coli target timeframe to 2060	Consistent with Wellington City Council's position on the matter	Allow
S211 Hutt City Council	S211.005	General comments - urban development	Not Stated	Considers that the proposed prohibited activity status for unplanned greenfield development is inconsistent with Policy 8 of the NPS-UD, could prevent HCC from meeting its ongoing requirements under the NPS-UD, and precludes consenting pathways for development in unplanned greenfield areas which would otherwise be appropriate and/or have positive outcomes.	Not Stated	Consistent with Wellington City Council's position on the matter	Allow

S211 Hutt City Council	S211.011	Policy WH.P3	Amend	Supports the use of actions plans to achieve objectives, provided that they are developed in partnership with territorial authorities.	Amend Policy WH.P3 as follows:  Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways The Wellington Regional Council shall, in partnership with mana whenua and territorial authorities, prepare and deliver Freshwater Action Plans in accordance with Schedule 27 (Freshwater Action Plan). The first iteration of Freshwater Action Plans, to cover all rivers and lakes in the Whaitua Te Whanganui-a-Tara, shall be completed by December 2026. Freshwater Action Plans shall identify, in detail, the actions, including to support effective regulation, to achieve the target attribute states, and support relevant environmental outcomes, set in this Plan.	Consistent with Wellington City Council's position on the matter	Allow
S211 Hutt City Council	S211.017	Policy WH.P31	Amend	Disagrees with the s32 evaluation, which states that there is higher risk of sediment discharge during the winter period (June-September). Considers that large storm events can occur throughout the year, resulting in large sediment discharges. Considers that earthworks during the winter period may be appropriate when there is a poor summer earthworks period due to adverse weather. Considers a BAU approach for winter earthworks should be maintained as a standard condition of consent as a discretionary activity which would allow GW to provide permits to undertake earthworks within this period as appropriate and subject to conditions.	Delete policy	Consistent with Wellington City Council's position on the matter	Allow
S261 Forest & Bird	S261.051	Objective WH.O3	Oppose	Considers timeframe too far away to ensure coastal values in Te Whanganui-a-Tara are not compromised.	Amend timeframe for achievement to 2030. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Inconsistent with Wellington City Council's position on the matter	Disallow

S261 Forest & Bird	S261.099	Rule WH.R5	Oppose	Considers greater Council oversight is required for elements of the rule, noting clause (h) is not sufficiently certain and enforceable for a permitted activity. Considers higher activity status and adding clearer and enforceable standards are required to ensure compliance with RMA s70, and that cumulative significant adverse effects do not arise. Considers WSUD should be required at minimum.	Reclassify as a controlled activity. Include enforceable alternative standards. Distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification. Require "water sensitive urban design" as a condition of consent, including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens. Any further consequential or alternative relief as may be necessary and appropriate to address concerns.	Inconsistent with Wellington City Council's position on the matter	Disallow
S248 Ara Poutama Aotearoa the Department of Corrections	s248.017	Redevelopment	Amend	Seeks reference to redevelopment of existing urbanised property is removed, as the definition also applies to rules that are not exclusively limited to redevelopment of urbanised property - refers to WH.R11 for example. Secondly, reference to "minor" under the first bullet point should be removed as the term 'minor' is subjective and adds uncertainty to scope of definition.	Amend as follows:  For the purpose of assessment of a proposal involving the redevelopment of an existing urbanised property (i.e brownfield development, upgrades to existing roads etc.) in relation to stormwater effects, this includes the replacement, reconstruction or addition (new) of impervious surfaces. Excludes: - minor maintenance or repairs to roads, carparking areas, driveways, and paving - installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing -activities that only involve the re-roofing of existing buildings.	Consistent with Wellington City Council's position on the matter	Allow

FORM 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,**  
**SUBMISSION ON NOTIFIED PROPOSED POLICY STATEMENT**  
**OR PLAN, CHANGE OR VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To Greater Wellington Regional Council  
Environmental Policy  
PO Box 11646  
Manners Street  
Wellington 6142

**Name Wellington International Airport Limited (“WIAL”)**

- 1. These are further submissions in opposition to or in support of submissions on Proposed Plan Change 1 (“PC1”) to the Natural Resource Plan (“NRP”).**
  
- 2. WIAL has an interest in PC1 to the NRP that is greater than the interest the general public has within the region.**
  - 2.1 WIAL made a number of original submissions on PC1 to the NRP.
  - 2.2 As set out in WIAL’s original submissions on PC1:
    - 2.2.1 Wellington Airport is managed by WIAL. WIAL is a network utility operator and a requiring authority under section 166 of the Resource Management Act 1991 (“**the RMA** or “**the Act**”);
    - 2.2.2 WIAL owns and operates the regionally and nationally significant Wellington International Airport;
    - 2.2.3 The Airport plays a fundamental role in the social and economic wellbeing of Wellington City, the region and the country;
    - 2.2.4 The Airport provides an important national and international transport link for the local, regional and international community and has a major influence on the regional and national economy;



- 2.2.5 The Airport is also a provider of emergency services and is a lifeline utility under the Civil Defence Emergency Management Act 2002 (“**CDEM 2002**”);
- 2.3 Given WIAL’s role in managing the Airport and as a submitter on the PC1, WIAL has an interest greater than the general public and is concerned to ensure that changes made to the NRP via PC1 appropriately recognise and provide for the Airport and allow it to operate in a safe, efficient and effective manner, whilst ensuring that adverse environmental effects are appropriately avoided, remedied or mitigated, commensurate to the nature and scale of the activity and/or effects.

**3. WIAL therefore makes the following further submissions pursuant to clause 8 of the First Schedule to the RMA. Further submissions from WIAL on the Proposed Plan, including the particular parts of the submission that WIAL supports or opposes, and WIAL’s reasons for that support or opposition, are attached to this document in Appendix A.**

**4. WIAL will not gain an advantage in trade competition through these further submissions.**

**5. General Reasons for WIAL’s further submissions:**

5.1 In its original submission, WIAL emphasised the importance of ensuring that the NRP adequately addresses the following matters (refer to the primary submission for the full suite of considerations):

5.1.1 That regionally significant infrastructure, such as Wellington International Airport, is appropriately recognised and provided for in the NRP. Proposed Plan. That includes through ensuring an appropriate consenting pathway is provided for all activities undertaken by WIAL;

5.1.2 That changes to the NRP intended to give effect to the National Policy Statement for Freshwater Management (“**NPSFM**”) do not create inconsistency with the New Zealand Coastal Policy Statement (“**NZCPS**”) and the remaining sections of the Operative NRP which are not subject to the Proposed NRP and relate to the coastal marine area / coastal environment;

5.1.3 That a pathway remains for WIAL to undertake works within various scheduled areas within the coastal marine area, as per the approach set out in Policy 11 of the NZCPS and the NRP;

5.1.4 That the introduction of new provisions around the unplanned greenfield development does not inadvertently capture activities being undertaken by regionally significant infrastructure, such as WIAL. This includes the

forthcoming seawall renewal project, which is located with a mapped “unplanned greenfield development” area;

5.1.5 The operative approach to providing for a “one stop shop” for WIAL’s stormwater discharges is maintained in the NRP. This approach allows for a more comprehensive and integrated approach for stormwater management across the airport campus.

5.1.6 New earthwork provisions are considered for regionally significant infrastructure that better recognise the frequency and volume of earthworks undertaken by these entities, as well as the need to earthworks to be undertaken year round.

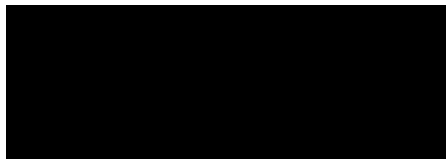
5.1.7 The removal of financial contributions for regionally significant infrastructure, or alternatively, for WIAL, whom treat and manage all of its discharges in an integrated and holistic manner with very limited reliance on the Council infrastructure network.

5.2 WIAL seeks to ensure that the key principles identified in its original submission and summarised above are appropriately recognised and provided for in the Proposed Plan.

5.3 WIAL’s specific further submissions are attached as **Appendix A**.

**6. WIAL does wish to be heard in support of these further submissions. If others make a similar submission, WIAL will consider presenting a joint case with them at a hearing.**

Signature:



Jo Lester, Planning Manager,  
Wellington International Airport Limited

Date: 8 March 2024

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ANNEXURE A – Wellington International Airport Limited further submissions on Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
<b>Objectives</b>					
Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Wellington Water Limited S151.038	Neutral	Retain application to a water bodies in a coastal area/wha tua  Other references may be required to address the issues identified, including reference that is a natural, additional or consequential.	Support in part	WAL supports the retention of the Operational NRP provisions where further works are required to be undertaken to confirm the appropriateness or otherwise of other provisions within the NRP.  WAL supports the retention and application of Objective O19 where further works being undertaken on the appropriateness or otherwise of target attribute states.
Table 3.7 Natural Wetlands	Wellington Water Limited S151.04	Neutral	Retain where further detail on Target Attribute States is developed.	Support in part	WAL supports the retention and application of Table 3.7 where further works being undertaken on the appropriateness or otherwise of target attribute states.
<b>5.2 and 5.3 Discharges to Land and Water and Land Use Rules</b>					
Rule R101: Earthworks – permitted activity.	Transpower New Zealand Limited S177.015	Oppose	Retain rule R101 so that it continues to apply in Wha tua Te Whanganu-a-Tara and Te Awarua-o-Porua Wha tua.	Support	WAL supports the recommended reference and agrees that the operational rule provides reasonable conditions for undertaking other earthworks that are less than 3,000m2 that are not otherwise permitted by WH.R23 and P.R22.
<b>8 Whaitua Te Whanganui-a-Ta</b>					
Objective WH.O1: The health of a freshwater bodies and the coastal marine area within Wha tua Te Whanganu-a-Tara is progressively improved and sustained by 2100.	Transpower New Zealand Limited S177.018	Amend	That Objective WH.O1 be amended as follows:  .....  Note in the waiver state: Āhua (natural character) is restored to the extent that this is possible, and freshwater bodies exhibit the natural quality, rhythms, range of flows, form, hydrology and character.  .....	Support in part.	WAL supports in part, the reference sought and agrees that restoration of natural character in relation to a freshwater bodies and coastal marine areas is not a reasonably achievable objective where existing regulatory significant infrastructure is located over or within freshwater bodies or the coastal marine area.
	Hutt City Council S211.006	Support	That Objective WH.O1 be amended as follows:  .....  Note in the waiver state:  .....  -A freshwater bodies have protected margins <u>where possible</u> .	Support	WAL supports the qualified reference to freshwater bodies being protected margins as this acknowledges that this is not always physically possible (i.e. due to space constraints) to appropriate (due to operational and functional requirements of regulatory significant infrastructure) to provide for protected margins, particularly where those freshwater bodies are highly modified.
	Kāinga Ora S257.010	Not stated	Mostly supportive of the proposed objectives but notes that some objectives would be difficult to achieve. Seeks outcomes across PC1 to ensure the Plan Change does not extend beyond that necessary to implement the NPS-FM, noting the considerable additional regulatory burden	Support in part	WAL supports alignment with the NPSFM and in doing so, considers this appropriate to ensure PC1 recognises that specified infrastructure and other forms of development are provided a specific policy and consenting pathway that also needs to be reflected in the plan change.

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			such a framework imposes upon a range of stakeholders. ....		
	Environmental Defence Society S222.022	Amend	To give effect to the NPSFM.  Delete "Note" so that the water state has equal effect as part of the objective. Amend 2100 to 2050 to reflect the urgency of addressing freshwater issues and the biodiversity crisis.	Oppose in part	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that in achieving this outcome, all elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
Objective WH.02: The health and wellbeing of Te Whanganu-a-Tara's groundwater, rivers and natural wetlands and the rivers margins are on a trajectory of measurable improvement towards water.	Environmental Defence Society S222.023	Amend	Consistency with the and give effect to the NPSFM.  include reference to natural form and character in the objective (under (a) and refer to ecosystem health as this more consistent with the NPSFM.	Oppose in part	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that in achieving this outcome, all elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
	Forest and Bird S261.020	Amend	Amend as follows:  The health and wellbeing of Te Whanganu-a-Tara's groundwater, rivers, <u>ephemeral watercourses</u> , and natural wetlands and the river margins are on a trajectory of measurable improvement towards water, such that by <del>2030</del> <del>2040</del> : include reference to natural form and character in clause (a) and refer to ecosystem health .e.: "(a) water quality, habitats, <u>natural form and character</u> ... are at a level where the state of <del>aquatic</del> <del>ecosystem health</del> is meaningfully improved..." Any further consequential or alternative references may be necessary and appropriate to address concerns.	Oppose in part	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that in achieving this outcome, all elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
Objective WH.03: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganu-a-Tara's mainstem or improved to achieve the coastal water objectives set out in Table 8.1	Wellington Fish and Game Regional Council S188.033	Amend	Amend Clause c):  (c) diversity, abundance, composition, structure, and condition of mahinga ka species and communities, <u>including valued introduced species</u> , has increased.	Oppose	While WIAL acknowledges that some indigenous freshwater species are afforded specific recognition under different statutes, the use of the term "valued introduced species" goes significantly further than those requirements.
Table 8.1 Coastal Water Objectives	Environmental Defence Society S222.025  Forest and Bird S261.052	Amend	include a parameter for Turbidity. Wording for parameter is as follows:  <u>Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Te Whanganu-a-Tara Harbour and estuary, Makara Estuary, Waiuomata Estuary: &lt;6.9; Waita: No discernible change).</u>	Oppose	WIAL opposes to the new parameters and is unsure, from a section 32 perspective, whether these additions are appropriate with the coastal environment and if so, if they are set at an appropriate level.

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			Add further parameters (for example lead, dissolved oxygen, temperature, pH, secch depth, chlorophyll-a, total phosphorous, total nitrogen, nitrate-nitrogen, ammonia nitrogen, and faecal coliforms) to ensure narrative objectives in Table 3.8 of the Operational Plan are met. Amend Waitaiti for Enterococci: <200 <40  Add nutrient meframes as per NPSFM 3.11.		
Objective WH.09: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Environmental Defence Society Inc S222.032  Forest and Bird S261.060	Amend	Considers natural form and character a key value of rivers and streams in the Whanganui-a-Tara area and is directed as a potential value in the NPSFM. Considers protection of natural form and character is required to protect habitat.	Oppose	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that the achievement of this outcome, the elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
Policy WH.P1: Improvement of aquatic ecosystem health.	Environmental Defence Society Inc S222.034  Forest and Bird S261.062	Amend	To give effect to NPSFM.  Seeks explicit provisions for natural form and character.	Oppose	While WIAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that the achievement of this outcome, the elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.
Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Wellington City Council S33.035	Amend	Amend as follows:  Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Act on Plans, by:  (a) <del>prohibiting unpermitted greenfield development for other greenfield developments in</del> <del>minimising the contaminants and requiring contaminants and requiring financial contributions as to offset adverse effects from residential stormwater contaminants, and</del>  (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and  (c) <del>imposing hydrological controls on urban development and stormwater discharges to rivers</del>  (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, <u>through stormwater management strategies</u> and...	Support in part	WIAL supports the general trajectory of this amendment and agrees with the submitter that the section 32 evaluation does not demonstrate the prohibition of unpermitted greenfield development as being the most appropriate to achieve the objectives of the plan.
	Summerset Group Holdings Limited S38.005		Amend policy as follows  Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Act on Plans, by:	Support in part	WIAL shares the concerns of the submitter that the activity status that ensues from this policy provides no consenting pathway for proposals located in these areas that may have positive/better outcomes for the community and freshwater, nor has it been sufficiently justified in terms of section 32 of the RMA.

Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			(a) <del>prohibiting unpermitted greenfield development and for other greenfield developments</del> in managing the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants;  (b) .....		
	Transpower New Zealand Limited S177.020  Ara Poutama Aotearoa the Department of Corrections	Amend	Amend the policy as follows:  Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulated discharges and use activities in the Plan, and non-regulatory methods, including Freshwater Act on Plans, by:  (a) <del>prohibiting unpermitted greenfield development and for other greenfield developments</del> in managing the <u>discharge of stormwater</u> contaminants from <u>greenfield development</u> , and <u>where residual adverse effects from the discharge of stormwater contaminants are more than minor</u> , requiring <u>aquatic offsetting or compensation (which may include financial contributions)</u> as to offset adverse effects from residual stormwater contaminants, and  (b) ...	Support in part	WAL shares the concerns of the submitter that the definition of "unpermitted greenfield development" is broad, uncertain, and could prohibit maintenance, upgrading and development of regionally significant infrastructure. Consider prohibition on unpermitted greenfield development is inappropriate and must be removed.
	Forest and Bird S222.035	Amend	To give effect to the NPSFM.  Amend (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities. Support removal of stock from waterbodies and the coastal environment.	Oppose	While WAL supports the intent of the submission that PC1 should give effect to the NPSFM, it is imperative to ensure that in achieving this outcome, all elements of the NPSFM are appropriately recognised and provided for, including the specific policy approach for specified infrastructure.  WAL is also concerned that the proposed requirement to avoid significant adverse effects is too broad and needs to be qualified and tied back to the chapeau of the policy (i.e. significant adverse effects of earthworks on target attribute states and coastal water objectives).
	Upper Hutt City Council S225.067	Oppose	Seek that the policy is amended to read: ...  (a) <del>prohibiting management</del> unpermitted greenfield development and for other greenfield developments in managing the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and"	Support in part	WAL supports the proposed amendments to mb (a) and agrees that that the proposed prohibition undermines the District Plan changes and reviews currently underway or proposed in future.
	S245 Tama Potaka, Minister of Conservation S245.003	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	While WAL considers it appropriate for the policy intent to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			Amend Policies to be consistent with NZCPS Policy 23. Requests the following wording be added Promoting design options that reduce flows to stormwater retention systems at source.		WAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.
	Ka nga Ora S257.011	Oppose	Remove reference to prohibiting unapproved greenfield development at WH.P2(a).	Support	WAL agrees with the submitter that prohibition of unapproved greenfield developments is appropriate and has not been appropriately evaluated in terms of section 32 of the RMA.
	Forest and Biodiversity 261.063	Amend	Amend (a) as follows:  ... prohibiting unapproved greenfield development and for other greenfield developments minimising the contaminants so that adverse effects are avoided and requiring finance contributions as to offset adverse effects from residual stormwater contaminants  Amend clause (e) so that it refers to ephemeral watercourses, wetlands and estuaries.  Add clause ( ) and use intensification that individual or cumulative may lead to a decline in water quality is prohibited.  Any further consequential or alternative references may be necessary and appropriate to address concerns.	Oppose	The proposed amendments are too vague and do not qualify the nature of the effects that are to be avoided (i.e. adverse effects on what) or the significance (i.e. adverse effects, regardless of the scale).  The proposed new ( ) does not recognise that water quality improvements need to be achieved on a catchment wide basis. As drafted, fully compliant discharges would effectively be prohibited which is inappropriate.
Policy WH.P5: Localised adverse effects of point source discharge.	Tama Potaka, Minister of Conservation S245.004	Amend	Requests a new part which includes the relevant criteria from NZCPS Policy 23 (f). Wording proposed is as follows:  <u>and by</u>  <u>(f) using the smallest maximum zone necessary to achieve the required water quality in the receiving environment;</u>  <u>and</u>  <u>(g) minimising adverse effect on the life-supporting capacity of water within a maximum zone.</u>	Oppose in part	While WAL considers it appropriate for the policy content to be generally consistent with Policy 23 of the NZCPS, the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.  Grammarly, (g) does not fit with the drafting of the policy.
Policy WH.P8: Avoiding discharges of specific products and waste.	Tama Potaka, Minister of Conservation S245.006	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	While WAL considers it appropriate for the policy content to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.  WAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.
	BP Oil & Gas Ltd, Mobil Oil & Gas Ltd, Z Energy Ltd - The Fuel Companies S258.011	Amend	Amend Policy WH.P8, as follows:  Policy WH.P8: Avoiding discharges of specific products and waste  Avoid, as a first priority, discharges to freshwater and coastal water, including where this is via the stormwater network, of:	Support	WAL agrees that this is appropriate for the policy to consider accidental discharges.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			<p>(a) chemical cleaning products, paint, solvents, fuels and coolants, wet cement products and drinking water, or</p> <p>(b) an effluent from an effluent storage facility or from an area where effluents are confined, or</p> <p>(c) untreated industrial or trade waste, or</p> <p>(d) untreated organic waste or leachate from storage of organic material.</p> <p><u>Where there is a residual risk of a discharge of the substances listed in (a) to (d) above, including any accidental spillage, management measures are implemented to contain and/or treat the discharge to avoid or mitigate adverse effects on freshwater or coastal water.</u></p>		
	Forest and Road S261.070	Amend	<p>Seeks for referenced discharges to be broadened to include anything at a concentration that may kill fish.</p> <p>Add causes:</p> <p><u>(e) rubbish</u></p> <p><u>(f) agricultural chemicals, fertilisers, persistent chemicals</u></p> <p><u>(g) any other material that may kill fish</u></p>	Oppose	Where WIAL does not have any particular issue with restrictions being imposed that seek to ensure discharges are not at concentrations (after the zone of reasonable mixing) that would cause fish mortality, this outcome is not reflected in the specific relief sought by the submitter. The relief sought is much broader and therefore requires considerable refinement.
Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	CentrePort Limited S90.004		Support the intent of the policy	Support	WIAL supports the intent of Policy WH.P9.
	Tama Potaka, Minister of Conservation S245.007	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	<p>Where WIAL considers it appropriate for the policy intent to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.</p> <p>WIAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict with the requirements of the NPSFM and NZCPS.</p>
Policy WH.P10: Managing adverse effects of stormwater discharges.	Wellington City Council S33.043	Amend	<p>Amend as follows:</p> <p>Policy WH.P10: Managing adverse effects of stormwater discharges</p> <p>All stormwater discharges and associated land use activities <u>that is not managed by a stormwater management strategy</u> shall be managed by...</p>	Support	WIAL holds an existing global stormwater discharge permit which includes a comprehensive stormwater management plan. WIAL therefore agrees that it is appropriate for such circumstances to be recognised within the policy (and methods) to avoid granting consent over and above that.
	Summerset Group Holdings Limited S38.006	Amend	Review policy and rule framework for the treatment of stormwater, and provide technical standards for acceptable solutions.	Oppose in part	Where WIAL has no issue with the intent of the submissions, WIAL is unclear of the nature or extent of the changes being proposed.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
	Hutt City Council S211.013	Amend	Develop more comprehensive objectives and policies for hydrological control and WSUD measures including acceptable solutions and amend policy.	Oppose in part	Where W AL has no issue with the content of the submissions, W AL is unclear of the nature or extent of the changes being proposed.
	Upper Hutt City Council S225.075	Amend	The scope of this policy should be narrowed to apply only to stormwater networks not individual developments within a network, except for point source discharges to surface water. This should not apply to one house or rural scenarios which discharge directly to and via soak pits or other similar systems.	Oppose in part	Where W AL has no issue with the content of the submissions, W AL is unclear of the nature or extent of the changes being proposed.
	Tama Potaka, Minister of Conservation	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	Where W AL considers it appropriate for the policy intent to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.  W AL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential draft amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.
	New Zealand Transport Agency	Amend	Modify WH.P10(a) to provide for flexibility where the stormwater network operator does not have full mandate over the contaminant source. Any further alternative or consequential references may be necessary to fully achieve the reference sought.	Support	W AL operates and maintains a stormwater management system that includes stormwater captured from surrounding residential areas. W AL therefore supports the proposed amendments as W AL does not have control over the contaminant source.
Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Transpower New Zealand Limited S177.021 Ara Poutama Aotearoa the Department of Corrections S248.021	Amend	Amend policy as follows:  Policy WH.P11: Discharges of <del>contaminants</del> <u>hazardous substances</u> in stormwater from high risk industrial or trade premises  The discharge of stormwater to water, including risk industrial or trade premises shall be managed by:  (a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and  (b) avoiding <del>contaminants</del> or hazardous substances being entrained in stormwater and discharged to a surface water body or coastal water, including via the stormwater network, or where avoidance is not practicable, implementing good management practice to avoid or minimise adverse effects on the environment, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management procedures, and monitoring, and  .....	Support	W AL agrees with the submitter that this impact can be avoided by other policies.
	Tama Potaka, Minister of Conservation S245.009	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	Where W AL considers it appropriate for the policy intent to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
					W AL a so notes that the po cy re ates to freshwater and coasta water. Care therefore needs to be taken to ensure that any potent a draft ng amendments do not nappropri ate y conf ate the requ rements of the NPSFM and NZCPS.
	Forest and B rd S261.073	Amend	Cons ders h gher eve s of contro are requ red where stormwater s com ng from a h gh r sk ocat on.  Requ re resource consent for d scharges of stormwater from h gh r sk areas. Any further consequent a or a ternat ve re ef as may be necessary and appropr ate to address concerns.	Oppose	n the absence of spec f c draft ng, W AL opposes th s re ef.
Po cy WH.P12: Manag ng stormwater from a port or a rport.	Tama Potaka, M n ster of Conservat on S245.010	Amend	Supports the ntent of the po cy but t needs to be cons stent w th NZCPS Po cy 23.	Oppose n part	Wh e W AL cons ders t appropr ate for the po cy ntent to be genera y cons stent w th Po cy 23 of the NZCPS, the extent of those changes s unc ear.
	Forest and B rd S261.074	Amend	Cons ders h gher eve s of contro are requ red where stormwater s com ng from a h gh r sk ocat on.  Requ re resource consent for d scharges of stormwater from h gh r sk areas. Any further consequent a or a ternat ve re ef as may be necessary and appropr ate to address concerns.	Oppose	n the absence of spec f c draft ng, W AL opposes th s re ef.
Po cy WH.P14: Stormwater d scharges from new and redeve oped mperv ous surfaces.	We ngton C ty Counc (S33.046)	Oppose	De ete the po cy as not f ed.	Support	n the absence of the re ef sought by W AL n ts subm ss on, W AL supports the de et on of th s po cy.
	Upper Hutt C ty Counc	Amend	Amend the def n t on of redeve opment and rev ew the pract ca y of thresho ds where th s po cy app es.	Support n part	W AL supports a substant ve rev ew of th s po cy.
	Tama Potaka, M n ster of Conservat on S245.012	Amend	Supports the ntent of the po cy but t needs to be cons stent w th NZCPS Po cy 23.	Support n part	Wh e W AL cons ders t appropr ate for the po cy ntent to be genera y cons stent w th Po cy 23 of the NZCPS, the extent of those changes s unc ear.  W AL a so notes that the po cy re ates to freshwater and coasta water. Care therefore needs to be taken to ensure that any potent a draft ng amendments do not nappropri ate y conf ate the requ rements of the NPSFM and NZCPS.
	Taranak Whānu S286.045		Deve op a more comprehens ve framework for hydro og ca contro and water sens t ve urban des gn measures, nc ud ng acceptab e techn ca so ut ons.	Support n part	W AL supports a substant ve rev ew of th s po cy.
Po cy WH.P15: Stormwater contam nant offsett ng for new greenf e d deve opment.	We ngton C ty Counc S33.047	Oppose	De ete the po cy as not f ed.	Support	n the absence of the re ef sought by W AL n ts subm ss on, W AL supports the de et on of th s po cy.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
	Tama Potaka, Minister of Conservation S245.0113	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	<p>When WIAL considers it appropriate for the policy intent to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.</p> <p>WIAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.</p>
Policy WH.P16: Stormwater discharges from new unplanned greenfield development	Summerset Group Holdings Limited S38.009	Oppose	Delete the policy.	Support	WIAL shares the concerns of this submitter that the activity status stemming from this policy provides no consenting pathway for proposals located in these areas that may have positive/better outcomes for the community or freshwater. WIAL also agrees that the use of a prohibited activity status is not justified in the Section 32 Evaluation.
	Transpower New Zealand Limited S177.024 Ara Poutama Aotearoa the Department of Conservation S248.024	Oppose	Delete the policy.	Support	WIAL agrees that the term unplanned greenfield development is too broad and uncertain and how the approach could prohibit works on regional significant infrastructure in areas identified as "unplanned greenfield development areas".
	Upper Hutt City Council S225.079	Oppose	Delete policy or amend significantly to change from 'avoid' to 'minimise' and specify that this should not apply to developments that feed into an existing stormwater network that will have an existing stormwater consent.	Support in part	WIAL supports the deletion of this policy, however notes that if the avoidance directive is to be amended to minimise, further amendments are still required to the policy to address the concerns raised in WIAL's submission.
	Tama Potaka, Minister of Conservation S245.0112	Amend	Supports the intent of the policy but it needs to be consistent with NZCPS Policy 23.	Oppose in part	<p>When WIAL considers it appropriate for the policy intent to be generally consistent with Policy 23 of the NZCPS, the extent of those changes is unclear.</p> <p>WIAL also notes that the policy relates to freshwater and coastal water. Care therefore needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.</p>
	Ka ngā Ora S257.021	Oppose	Delete the policy Alternatively, amend the proposed policy to provide a pathway where the effects from additional stormwater discharges can be managed appropriately.	Support in part	WIAL supports the submitters' recommendation that the policy be deleted or a policy pathway be provided where the effects from stormwater discharges can be appropriately managed.
Policy WH.P29: Management of earthworks.	Transpower New Zealand Limited S177.025 Ara Poutama Aotearoa the Department of Corrections S248.026	Amend	<p>Amend Policy WH.P29 as follows:</p> <p>Management of earthworks</p> <p>The risk adverse effects of sediment discharges from earthworks shall be managed by:</p> <p>(a) requiring retention in minimising the uncontrolled loss of soil and sediment on the land using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the GWRC Erosion and Sediment Control Guide for the Wellington Region (2021), for the duration of the land disturbance, and</p> <p>(b) limiting, where practicable, the amount of land disturbed at any time, and</p> <p>(c) ...</p>	Support in part	<p>WIAL supports the focus of the policy onto effects (as per the RMA).</p> <p>In addition to the scenario used in WIAL's submission, WIAL also agrees that some sediment may need to be discharged to a canal, therefore not retaining on site.</p> <p>WIAL also agrees that it is appropriate to qualify 'mitigate' to recognise that impacts placed on and disturbance should be reasonable and proportionate, particularly where good management practices are already in place.</p>



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
	Forest and B rd S261.090	Amend	Add new clause(x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area. Any further consequential or alternative effects may be necessary and appropriate to address concerns.	Oppose	The proposed amendments do not recognise that in some circumstances, earthworks may be required within or directly or indirectly adjacent to waterbodies (fresh and coastal). It is a so not clear what policy directives such activities would subsequently be considered under.
Policy WH.P31: Water shut down of earthworks.	Wellington Water Limited S151.089	Oppose	Amend to provide an exemption for Regional Significant Infrastructure.	Support	WAL agrees that an exemption should be provided for regional significant infrastructure, as set out in WAL's submission.
<b>8.3 Rules</b>					
Rule WH.R1: Point source discharges of specific contaminants - prohibited activity.	Wellington City Council S33.056 BP Southern Ltd, Mobil Oil NZ Ltd, Z Energy Ltd – The Fuel Companies S258.017 NZ Transport Agency S275.019	Oppose	Delete the rule	Support in part	WAL supports the rule to the extent that it addresses the matters raised in WAL's original submission.
	Fulton Hogan S43.014	Oppose	Amend the rule as follows:  Point source discharges of specific contaminants - prohibited activity  The point source discharge of <u>more than incidental levels of:</u>  (a) chemical cleaning products including vehicle cleaning products <u>and detergents unless these are biodegradable and non-ecotoxic</u> , bleach and disinfectant, or  .....  (g) <del>cement slurry, or cement wash</del> <u>cement slurry</u> and concrete cutting waste <u>unless these have been captured and treated to achieve a pH required by the water quality standards for the receiving waterbody, or</u>  ..	Support in part	WAL supports the rule to the extent that it addresses the matters raised in WAL's original submission.
	Upper Hutt City Council S225.094	Oppose	Delete or significantly rewrite to a more specific and reasonable approach. If a rule is retained, seek a more permissive activity status such as restricted discretionary.	Support in part	WAL supports the rule to the extent that it addresses the matters raised in WAL's original submission.
Rule WH.R5 Stormwater from new and redeveloped impervious surfaces – Permitted activity	CentrePort Limited S93.006	Amend	Amend the rule as follows  The use of and for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urban land property) and the associated discharge of stormwater into water, or onto or into and where it may enter a surface water body or coastal water, including	Support	WAL supports the clarification sought by CentrePort and considers the rule's generality consistent with that sought by WAL with respect to RULE WH.R1 to R7.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			through an existing or new local authority stormwater network, that is not a high risk industrial or trade premises or unpermitted greenfield development, or a port or a rport. is a permitted activity, provided the following conditions are met:  ... <u>For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater from a port or a rport, refer to WH.R8.</u>		
Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity	Wellington City Council S33.061	Oppose	Delete the rule	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission.
	Upper Hutt City Council S225.099	Oppose	Delete or amend to remove thresholds and contr but ons.	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission.
Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urban sealed areas - controlled activity.	Wellington City Council S33.062	Oppose	Delete the rule	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission.
	CentrePort Limited S93.006	Amend	Amend the rule as follows  Stormwater from new and redeveloped impervious surfaces of existing urban sealed areas - controlled activity The use of and for the creation of new and/or redevelopment of impervious surfaces of an existing urban sealed property and the associated discharge of stormwater into water, or onto or into and where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not a high risk industrial or trade premises, or a port or a rport, is a controlled activity, provided the following conditions are met: Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to Rule WH.R11.  ... <u>For the creation of new or redevelopment of existing impervious surfaces and associated discharge of stormwater from a port or a rport, refer to WH.R8.</u>	Support	WAL supports the clarification sought by CentrePort and considers the reference generally consistent with that sought by WAL with respect to RULE WH.R1 to R7.
	Upper Hutt City Council S225.100	Oppose	Delete or amend to remove thresholds and contr but ons.	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
Ru e WH.R8: Stormwater from a port or a rport - restr cted d scret onary act v ty.	CentrePort S93.008	Amend	Amend the ru e as fo ows:  Stormwater from a port or a rport- restr cted d scret onary act v ty  <u>The use of and for the creat on of new and/or redev opment of ex st ng mperv ous surfaces and the assoc ated</u> d scharge of stormwater from a port or a rport nto water, or onto or nto and where t may enter a surface water body or coasta water, nc ud ng through a oca author ty stormwater network, s a restr cted d scret onary act v ty where ...  <u>Note Ru es WH.RS and WH.R7 do not app y to d scharges of stormwater from a port or a rport.</u>	Support	W AL supports the c ar f cat on sought by CentrePort and cons ders the re ef s genera y cons tent w th that sought by W AL w th respect to Ru es WH.R1 to R7 and R11 to R12..
	Tama Potaka, M n ster of Conservat on S245.047	Amend	Amend Po c es to be cons tent w th NZCPS Po cy 23(4)(a) to (d)	Oppose n part	Wh e W AL cons ders t appropri ate for the ru e to g ve effect to the NZCPS (a prov s ons, not just Po cy 23), the extent of the changes proposed by the subm tter s unc ear.
	Taranak Whānu S286.072	Amend	Amend ru e to mprove c ar ty.  Supports n pr nc p e, and supports mah nga ka , Māor customary use and effects on Schedu e C (mana whenua) s tes be ng matters of d scret on. Notes t s unc ear f mah nga ka s tes and Māor customary use so e y refers to s tes sted n schedu es B and H respect ve y. Notes th s s ncons tent throughout PC1 and references WH.R8 as an examp e wh ch spec f ca y refers to Schedu e H for Māor customary use.	Support	W AL agrees that t wou d be usefu f further c ar ty around the nterpretat on of matter of d scret on 1 cou d be c ar f ed.
Ru e WH.R11: Stormwater from new and redev oped mperv ous surfaces - d scret onary act v ty.	We ngton C ty Counc S33.065		De ete the ru e n ts ent rety	Support n part	W AL supports the re ef to the extent that t addresses the matters ra sed n W AL's or g na subm ss on.
Ru e WH.R12: A other stormwater d scharges - non-comp y ng act v ty.	CentrePort S93.009	Oppose	Reta n d scret onary act v ty status for act v tes that cannot comp y w th Ru e WH.R8.	Support	W AL supports the retent on of a d scret onary act v ty status for A rport and Port d scharges and cons ders the non-comp y ng act v ty status has not been appropri ate y eva uated n terms of sect on 32 of the RMA.
	Ara Poutama Aotearoa the Department of Correct ons	Amend	Ru e WH.R12: A other stormwater d scharges <del>non-comp y ng</del> d scret onary act v ty (and subsequent amendments)	Support	W AL supports the ru e cascade to d scret onary for d scharges that cannot comp y w th Ru es R1 to R11 and cons ders a non-comp y ng act v ty status has not been adequate y just f ed under sect on 32 of the RMA.
Ru e WH.R13: Stormwater from new unpp anned greenf ed deve opment - proh b ted act v ty.	We ngton C ty Counc S33.067  Summerset Group Ho d ngs L m ted S38.017  Transpower New Zea and L m ted S177.037	Oppose	De ete ru e.	Support n part	W AL supports the re ef to the extent that t addresses the matters ra sed n W AL's or g na subm ss on.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
	Upper Hutt City Council S225.104				
	Ara Poutama Aotearoa the Department of Conservation S248.037				
	Kāinga Ora S257.033				
Rule WH.R23: Earthworks - permitted activity.	Wellington Water Ltd S151.099	Amend	Amend to restate the exemptions for certain earthworks activities as exist for 'other Wha tua',	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission, particularly with respect to the definition of earthworks and the exemptions afforded to the A report.
	Forest and Bird	Oppose	Amend as follows:  (d) the earthworks shall not occur within, or within a 10-5m setback from, of a surface water body, ephemera watercourse, or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and  (e) soil or debris from earthworks shall not be placed where it can enter a surface water body, ephemera watercourse, or the coastal marine area, including via a stormwater network, and  (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and  (g) there shall be no discharge of sediment from earthworks and/or flow onto a surface water body, ephemera watercourse, the coastal marine area, or onto and that may enter a surface water body, ephemera watercourse or the coastal marine area, including via a stormwater network, and  (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemera watercourse, or the coastal marine area, including via a stormwater network.	Oppose	WAL does not support an increase in the required setback to 10m. The permitted activity conditions already require, in addition to the setback, a requirement for sediment and erosion control measures to be put in place, which will effectively manage any potential discharges to any waterbody.  WAL also does not support the introduction of ephemera watercourse.
Rule WH.R24: Earthworks - restricted discretionary activity.	Wellington Water Ltd S151.100	Amend	Provide an exemption to (b) for RS .	Support	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission
	Transpower New Zealand Limited	Amend	Amend rule as follows:  Rule WH.R24: Earthworks  <del>Earthworks and the associated discharge of sediment and/or flow onto a surface water body or coastal water, or onto and where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23, and the associated discharge of sediment and/or flow onto a</del>	Support in part	WAL supports the reference to the extent that it addresses the matters raised in WAL's original submission





Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
			<p><u>surface water body or coastal water, or onto or into and where it may enter a surface water body or coastal water, including via a stormwater network, is a restricted discretionary activity, provided the following conditions are met:</u></p> <p>...</p> <p><del>and (b) earthworks shall not occur between 1st June and 30th September in any year.</del></p> <p>Matters for discretion</p> <p>...</p> <p><del>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period. Where earthworks will be undertaken within the period from 1 June to 30 September, the matters set out under section G5.0 of the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbance Activities in the Wellington Region (2021)</del></p> <p>9. Monitoring and reporting requirements</p> <p><u>Note Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbance Activities in the Wellington Region (2021).</u></p>		
<b>Schedules and Maps</b>					
Schedule F: Ecosystems and habitats with significant biodiversity values.	Environmental Defence Society S222.117 Forest and Bird S261.210	Amend	Consider including additional detail in the soon-to-be published DOC literature review of habitat requirements of native fish species.	Oppose	It is appropriate to seek to include new species from a yet to be published report. A subsequent variation should be advanced, as appropriate, to incorporate such changes.
Map 86: Unplanned greenfield areas – Wellington City Council.	Wellington City Council S33.149	Neutral	Amend boundaries to include an open space zone within the urban boundary.	Support in part	WAL supports the report to the extent that it addresses the matters raised in WAL's original submission
	Summerset Group Holdings Limited S38.036 Transpower New Zealand Limited S177.081	Oppose	Delete the map.	Support in part	WAL supports the report to the extent that it addresses the matters raised in WAL's original submission
<b>Definitions / general comments</b>					
General comments – definitions	Wellington Water S151.180	Amend	Define "point source discharge" so that it clearly excludes discharges from wastewater and stormwater networks.	Support	WAL supports this submission, noting that discharges from stormwater networks are generally managed differently to point source discharges.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
Po nt Source D scharge			Other re ef as may be requ red to address the ssues dent f ed, nc ud ng re ef that s a ternat ve, add t ona or consequent a .		
Genera comments – def n t ons Commensurate	We ngton Water S151.182	Amend	Add new def n t on as fo ows: <u>Commensurate: n the context of reduct ons n contam nants n wastewater or stormwater d scharges, means a eve of reduct on that s both proport onate to the effect of the d scharge on the rece v ng env ronment, and reasonab y w th n the contro of the app cant.</u>	Support	W AL supports the c ar f cat on prov ded by th s def n t on.
Genera comments – def n t ons Urban Zone	Greater We ngton Reg ona Counc	Amend	nc ude new def n t on as fo ows: Urban zones are the fo ow ng zones as set out n the Nat ona P ann ng standards: <ul style="list-style-type: none"> <li>&gt; <u>Res dent a zones ( arge ot res dent a , ow dens ty res dent a , genera res dent a , med um dens ty res dent a , h gh dens ty res dent a )</u></li> <li>&gt; <u>Commerc a and m xed-use zones (ne ghbourhood centre, oca centre, commerc a , arge format reta , m xed use, town centre, metropo tan centre, c ty centre)</u></li> <li>&gt; <u>ndustr a zones ( ght ndustr a , genera ndustr a , heavy ndustr a )</u></li> <li>&gt; <u>Spec a purpose zones un ess t can be demonstrated that the spec a purpose zone s a rura zone.</u></li> </ul>	Oppose	Wh e th s def n t on prov des some c ar ty around what compr ses “unp anned greenf e d deve opment, W AL’s concerns w th respect to the undy onerous requ rements around unp anned urban deve opment rema n unso ved.
Genera comments – def n t ons Earthworks	We ngton Water L m ted S151.005	Oppose	Seeks and exempt on for reg ona y s gn f cant nfrastructure from w nter shutdown works.	Support	W AL supports th s re ef to the extent that t s cons tent w th W AL’s subm ss on seek ng the nc us on of new earthwork prov s ons for reg ona y s gn f cant nfrastructure.
Genera comments – def n t ons Unp anned greenf e d deve opment	We ngton C ty Counc S33.004	Not stated	Concerned about the pract ca mp cat ons and un ntended consequences of unp anned greenf e d deve opment be ng a proh b ted act v ty. Cons ders th s w affect WCC’s ab ty to make strateg c dec s ons on growth and deve opment w thout a change to the D str ct and Reg ona P an, and d ff cu tes w th m nor changes to urban zon ng. Cons ders the proh b ted status has not been reasonab y just f ed, and that a ternat ves that cou d ach eve the strateg c ntent of the ru e w thout requ r ng a dua p an change process, such as a D scret onary Act v ty status, shou d be cons dered.	Support	W AL shares the same concerns as those set out by the subm tter and cons ders the prov s ons re at ng to unp anned greenf e d deve opment requ re a s gn f cant rework and reva uat on under sect on 32 of the RMA.
	Transpower New Zea and L m ted S177.003	Not stated	Def ne the term "greenf e d deve opment", and that th s term must exc ude the operat on, ma ntenance, upgrad ng, or deve opment of reg ona y s gn f cant nfrastructure'.	Support	W AL agrees that the reg ona y s gn f cant nfrastructure must be exc uded from cons derat on n the “unp anned greenf e d deve opment” and “greenf e d deve opment” and cons ders that th s approach ends tse f to a spec f c po cy framework for reg ona y s gn f cant nfrastructure.



Provision	Submitter	Submitter Position	Decision requested	WIAL's further submission	Reason
General comments – definitions High risk industrial or trade premises	Transpower New Zealand Limited S177.010	Amend	Amend as follows: High risk industrial or trade premises - An industrial or trade premises that stores, uses or generates contaminants or hazardous substances on-site that are exposed to rain and could become entrained in stormwater. Activities that may occur at these premises could include:	Support	WAL supports the removal of the term 'contaminant' and considers this too broad to be used in a definition and could inadvertently capture agricultural and industrial premises, including low risk premises.
General comments – overall	Transpower New Zealand Limited S177.002	Not stated	Ensure that higher order direct on on regional infrastructure continues to be provided for through PC1 which has a so g v ng effect to the NPSFM.	Support	WAL supports consistency in the planning framework for regional infrastructure, as set out by this submitter. In ensuring consistency with the RPS, the framework should have a so g v ng effect to the NZCPS, in addition to the NPSFM.
General comments – stormwater management	Wellington Fish and Game Regional Council S188.012	Not stated	Requirement for demonstrating functional need, and the effects management hierarchy should be included to bring the Plan into alignment with current national directives.	Support in part	WAL supports the intent for a alignment between the NPSFM and the NRP. Notes however that: <ul style="list-style-type: none"> <li>➤ The NPSFM also includes provisions for specified infrastructure that cannot be overlooked and requires consideration in the NRP; and,</li> <li>➤ Care needs to be taken to ensure that any potential drafting amendments do not inappropriately conflict the requirements of the NPSFM and NZCPS.</li> </ul>
General Comments – Overall	Horokwai Quarries Ltd S002.006	Amend	Amend relevant provisions in the Whaitua Te Awarua-o-Porua (Objectives, Policies and Rules), consistent with the effect sought in submissions on points within this submission.	Support in part	WAL supports the effect to the extent that quarry activities are sufficiently provided for in the NRP. Quarries serve a critical support function to the upgrading and maintenance of regional infrastructure, such as Arports, and this needs to be appropriately recognised in the NRP.
General Comments – Overall	Winstone Aggregates S206.014	Not stated	Seeks specific consenting pathway for the continuation of regional infrastructure quarrying activities within the Wellington Region.	Support in part	WAL supports the effect to the extent that quarry activities are sufficiently provided for in the NRP. Quarries serve a critical support function to the upgrading and maintenance of regional infrastructure, such as Arports, and this needs to be appropriately recognised in the NRP.



**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

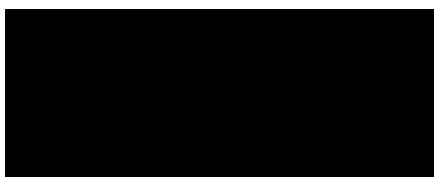
Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Environmental Defence Society Inc (S222)**

whose address for service is shay@eds.org.nz.

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



---

Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Section 5.4.5, Rule 128: New structures	Oppose	This is too onerous for Council water infrastructure.	Reject
Table 8.1 Coastal water objectives	Oppose	The target attribute states and coastal water objectives are already complex and highly aspirational. Further target attribute states would be unhelpful and unnecessary	Reject
Objective P.O3	Oppose	The target attribute states and coastal water objectives are already complex and highly aspirational.	Reject
All parts of the submission that request shorter timeframes for wai ora and TAS/CWO	Oppose	WWL opposes any shortening of the timeframes as notified, as this will make them unachievable.	Reject
Table 8.4: Target attribute states for rivers	Oppose	The target attribute states are already highly complex and aspirational. It is not clear what impact further changes may have on consenting network discharges, but WWL opposes any change that materially increases the difficulty of consenting.	Reject
WH.O9	Oppose	The change sought is inappropriate.	Reject

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Royal Forest and Bird Protection Society NZ (S261)**

whose address for service is a.geary@forestandbird.org.nz and freshwater@forestandbird.org.nz.

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



Part	Position	Reason	Outcome
All parts of the submission that seek inclusion of the term 'natural form and character' in the Whaitua objectives	Oppose	This term is broadly used but poorly understood, making it unclear what measures are needed to achieve the desired outcome	Reject
All parts of the submission that seek changes to water allocation provisions	Oppose	These parts are beyond the scope of PC1. Should it be determined that they are within the scope of PC1, WWL is opposed to them, as it supports the provisions as notified.	Reject
All parts of the submission that seek new target attribute states, interim target attribute states or changes to related timelines	Oppose	The target attribute states are already complex and highly aspirational. Further target attribute states are unnecessary and unhelpful. Setting interim target attribute states, or altering timelines will further complicate matters, particularly for sequencing and prioritisation of subcatchments.	Reject
Objective WH.O1 / P.O1	Oppose	The wai ora timeframe of 2050 is unachievable.	Reject
Policy WH.P2 / P.P2	Oppose	Avoidance is too onerous a requirement. It can have unexpected and undesirable outcomes when coupled with non-complying activity status.	Reject
Policy WH.P5 / P.P5	Oppose	The proposed changes are too onerous for network discharge consents.	Reject
Policy WH.P8 / P.P8	Oppose	These additions may be inappropriate for network discharge consents. For example, stormwater often picks up rubbish and fertilisers.	Reject
Policy WH.P10 / P.P9	Oppose	The phrase "toxicants, including" is too broad, and the focus should remain on zinc and copper.	Reject
Policy WH.P14 / P.P13	Oppose	It is unclear why a higher bar is set for the existing urban area than for greenfields. "Practicable" or "minimise" are appropriate words. "Possible" is not appropriate,	Reject
Policy WH.P15 / P.P14	Oppose	Financial contributions are a necessary and practicable tool in complex urban environments.	Reject
Policy WH.P19 / P.P18	Oppose	Elimination of dry weather discharges is not an appropriate target at this stage.	Reject

Policy WH.P20 / P.P19	Oppose	Insufficient information is provided to understand how this will impact on WWL's activities.	Reject
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**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

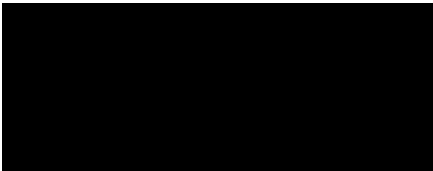
Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in support of a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Hutt City Council (S211)**

whose address for service is tim.johnstone@huttcity.govt.nz.

4. The particular parts of the submission WWL supports, the reasons for that support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Policy WH.P7	Support	WWL supports reviewing the wording to clarify the intent of the provision	Accept
Policy WH.P10	Support	WWL supports developing a comprehensive policy and implementation framework with regard to hydrological control and water sensitive urban design measures, including acceptable solutions.	Accept
General	Support	WWL broadly supports the intent of Hutt City Council's submission in relation to Council's analysis regarding the increased cost to ratepayers to reduce discharges and contaminants.	Accept

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

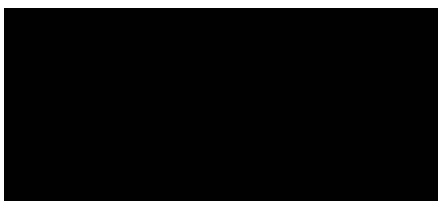
Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Kāinga Ora (S257)**

whose address for service is [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz).

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Policies WH.P14 / P.P13	Oppose	WWL understands the direction of Kāinga Ora's submission point. However, without more detail WWL cannot understand how it will impact on WWL's activities, networks and consents. WWL is particularly interested to ensure that implementation does not increase cumulative effects on water quality that WWL would then be expected to resolve.	Reject
Policies WH.P15 / P.P14	Oppose	WWL opposes the deletion of the financial contribution policies.	Reject
Rules WH.R6 / P.R6	Oppose	WWL opposes a more lenient activity status where works are in accordance with a certified subcatchment management plan, as it is not clear who will decide what works are in accordance.	Reject

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

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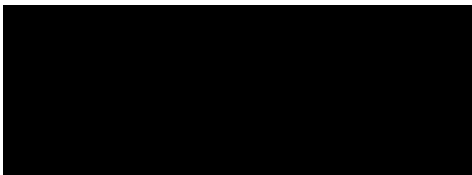
Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in support of a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**NZ Transport Agency (\$275)**

whose address for service is [evan.keating@nzta.govt](mailto:evan.keating@nzta.govt).

4. The particular parts of the submission WWL supports, the reasons for that support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)



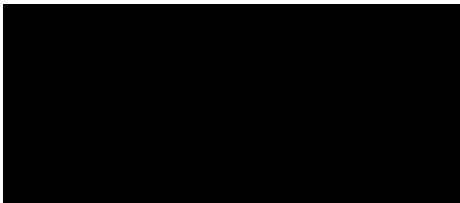
<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Policy P.P1 (GW reference 275.011)	Support	WWL supports further consideration of the feasibility and costs of these targets.	Accept
Policy P.P2 (GW reference 275.012)	Support	WWL supports further consideration of the feasibility and costs of these targets.	Accept
Policy P.P4 (GW reference 275.013)	Support	WWL supports further consideration of the feasibility and costs of these targets.	Accept
Policy P.P12 (GW reference 275.014)	Support	WWL supports further consideration of the feasibility and costs of these targets.	Accept

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in support of and partially in opposition to various submissions on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. The submissions to which this further submission relates, along with the address for service of each submitter, the particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
4. WWL wishes to be heard in support of its further submission.



Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



Submitter and address	Ref	Subject	Position	Reason	Outcome
S213 Pareraho Forest Trust (caitlincarew@gmail.com)	S213.020	WH.P13	Oppose	Wellington Water opposes the addition of Schedule F sites to (f). This would not be practicable for sequencing of sub-catchments.	Reject
S226 Higgins Contractors Limited (gen.walker@pdp.co.nz)	S226.006	WH.P13	Oppose	Stormwater management strategies and requirements of Schedule 31 apply to the local authority network and state highway network (and 'stormwater' excludes discharges associated with earthworks - which are instead addressed by part 5.4). It is therefore unclear what the submitter is seeking. However WWL opposes any suggestion that runoff effects on stormwater associated with smaller site redevelopment do not have to be properly managed.	Reject
S241 Pukerua Property Group Ltd (bryce@landmatters.nz)	S241.010	WH.P13	Oppose	The submitter seeks deletion of all stormwater policies. WWL supports stormwater controls for certain land use.	Reject
S243 Land Matters Limited (bryce@landmatters.nz)	S243.004	WH.P13	Oppose	The submitter seeks deletion of all stormwater policies. WWL supports stormwater controls for certain land use.	Reject
S226 Higgins Contractors Limited (gen.walker@pdp.co.nz)	S226.014 and others	WH.R9 and other stormwater rules	Oppose	Wellington Water does not consider rule WH.R9 is unclear about which discharges it relates to, or that a new rule is necessary (and it is not clear that the kinds of discharge described by the submitter would qualify as 'stormwater'). WWL has an interest in any changes to WH.R9 or other stormwater rules proposed by this submitter.	Reject
S183 Yvonne Weeber (143 Queens Drive, Lyall Bay, Wellington 6022)	S183.237	WH.R14	Oppose	While it is not entirely clear what the submitter is seeking, WWL cannot control private cross connections where wastewater may enter the stormwater network and opposes any changes in this regard.	Reject
S241 Pukerua Property Group Ltd (bryce@landmatters.nz)	S241.027	P.P12	Oppose	The submitter seeks deletion of all stormwater policies. WWL supports stormwater controls for certain land uses.	Reject
S243 Land Matters Limited (bryce@landmatters.nz)	S243.015	P.P12	Oppose	The submitter seeks deletion of all stormwater policies. WWL supports stormwater controls for certain land uses.	Reject



S255 Woodridge Holdings Ltd (21 Severn Street, Island Bay, Wellington 6023)	S255.046	P.P12	Support	Submitter notes divergence between P.P12(a) referring to 15% copper reduction while Table 9.3 refers to 40%. WWL supports fixing inconsistencies in the plan, insofar as it is consistent with its original submission, but in this instance seeks that the reference to 15% in P12 remain.	Reject
S255 Woodridge Holdings Ltd (21 Severn Street, Island Bay, Wellington 6023)	S255.058	P.R8	Oppose	Oppose combining this rule with WH.R9 as they relate to different whitua, however it is important to ensure they are as consistent as possible (i.e. unless there are good reasons for a different approach).	Reject
S255 Woodridge Holdings Ltd (21 Severn Street, Island Bay, Wellington 6023)	S255.063	P.R13	Oppose	Oppose combining this rule with WH.R14 as they relate to different whitua, however it is important to ensure they are as consistent as possible (i.e. unless there are good reasons for a different approach).	Reject
S226 Higgins Contractors Limited (gen.walker@pdp.co.nz)	S226.017	Schedule 31	Oppose	Schedule 31 only relates to the local authority or state highway stormwater network.	Reject
S255 Woodridge Holdings Ltd (21 Severn Street, Island Bay, Wellington 6023)	S255.098	Schedule 31	Oppose	It is not necessary to provide clarity in Schedule 31 as to whether local authorities have to accept compliant discharges into their network. It is sufficient that requirements will be identified in the SMS for any connections to the stormwater network	Reject
S106 Korokoro Environment Group (Tamsin.falconer@gmail.com)	S106.003	Schedule 32	Oppose	Oppose in so far as relief sought is inconsistent with changes Wellington Water has sought to Strategic action (m) in its submission.	Reject

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in support of a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Porirua City Council (\$240)**

whose address for service is helen.oram@porirua.govt.nz.

4. The particular parts of the submission WWL supports, the reasons for that support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



Part	Position	Reason	Outcome
General	Support	WWL broadly supports the intent of Porirua City Council's submission in relation to Council's analysis regarding the increased cost to ratepayers to reduce discharges and contaminants.	Accept

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in support of and partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Tama Potaka, Minister of Conservation (S245)**

whose address for service is hfamilyton@doc.govt.nz.

4. The particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




---

Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
All parts of the submission that seek changes to water allocation provisions in Te Whanganui a Tara	Oppose	These parts are beyond the scope of PC1. Should it be determined that they are within the scope of PC1, WWL is opposed to them, as it supports the provisions as notified.	Reject
Policy WH.P1	Support	WWL supports the additional provision regarding on-site control of stormwater, but notes that there will be some sites where this is not practicable. WWL therefore supports the additional provision, provided a practicability requirement is included.	Accept
Policy WH.P5	Oppose	The addition of NZCPS criteria and the 'smallest mixing zone possible' is inappropriate and unworkable.	Reject
Policy WH.P19	Oppose	The amendments will complicate sequencing in WWL's network discharge applications. Further, the amendments seem to apply to private cross-connections, and, if retained, should be limited to public cross-connections; and it is unclear what 'non target public' means.	Reject
Policy P.P1	Support	WWL supports the additional provision regarding on-site control of stormwater, but notes that there will be some sites where this is not practicable. WWL therefore supports the additional provision, provided a practicability requirement is included.	Accept
Policy P.P5	Oppose	The addition of NZCPS criteria and the 'smallest mixing zone possible' is inappropriate and unworkable.	Reject
Policy P.P18	Oppose	The amendments will complicate sequencing in WWL's network discharge applications. Further, the amendments seem to apply to private cross-connections, and, if retained, should be limited to public cross-connections; and it is unclear what 'non target public' means.	Reject
Rules WH.R1-R16	Oppose	The changes sought are not practicable for wastewater discharges.	Reject
Rules P.R1-R15	Oppose	The changes sought are not practicable for wastewater discharges.	Reject

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

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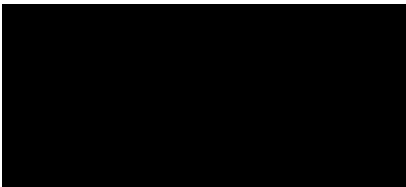
Name of Further Submitter: Wellington Water Limited (**WWL**)

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2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Taranaki Whānui (S286)**

whose address for service is [kirsty@portnicholson.org.nz](mailto:kirsty@portnicholson.org.nz).

4. The particular parts of the submission WWL supports, the reasons for that support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



---

Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
General	Support	WWL supports Taranaki Whānui's submission in relation to the relationship between funding and target attribute states.	Accept

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

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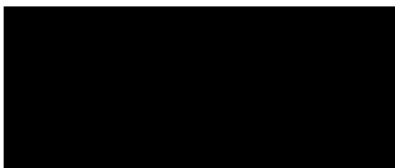
Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Taumata Arowai (S116)**

whose address for service is [measures@taumataarowai.govt.nz](mailto:measures@taumataarowai.govt.nz).

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)





<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
The entire interpretation and definitions section	Oppose	There is insufficient detail provided to understand how this would impact WWL's activities.	Reject

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

Name of Further Submitter: Wellington Water Limited (**WWL**)

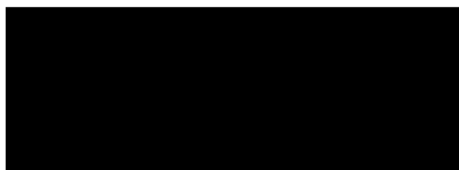
1. This is a further submission partially in support of and partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.

3. This further submission relates to the submission of:

**Upper Hutt City Council (S225)**

whose address for service is geoff.swainson@uhcc.govt.nz and helen.hamilton@uhcc.govt.nz.

4. The particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
General	Support	WWL supports all those parts of UHCC's submission addressing issues related to investment for achieving the target attribute states and implementation of consents for Council-owned infrastructure.	Accept
Policy WH.P8	Oppose	WWL considers that many of the discharges fall outside the scope of the stage 2 global stormwater consent.	Reject
Policy WH.P10	Support in part	WWL agrees that the chapeau is too broad. However, WWL considers that narrowing the provision should exclude Council-owned networks as they are specifically covered elsewhere.	Accept in part
Policy WH.P18	Support	WWL agrees that more clarity would be helpful.	Accept
Policy WH.P19	Support	WWL supports increased consultation and realistic timeframes.	Accept

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council


Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Water New Zealand (S246)**

whose address for service is nicci.wood@waternz.org.nz.

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Bullet 2 of paragraph 10	Oppose	Integration of strategies across all water services at the level of detail required for RMA processes is unachievable. This is a good idea, but not within the RMA arena.	Reject

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in support of and partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Wellington City Council (S033)**

whose address for service is michael.duindam@wcc.govt.nz.
4. The particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
General	Support	WWL broadly supports the intent of WCC's submission in relation to Council's analysis regarding the increased cost to ratepayers to reduce discharges and contaminants.	Accept
Policies WH.P10, WH.P14 and WH.P15	Oppose in part, support in part	WWL is neutral on whether the subject matter of these provisions best sits within regional or district planning, but considers it is crucially important to ensure there are no gaps across the four cities that would impact on WWL's ability to implement its stage 2 stormwater consent. WWL would welcome the opportunity to discuss these issues with the four city councils and GWRC.	Accept in part, reject in part

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**


To: Greater Wellington Regional Council

Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in support and partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Wellington Fish and Game Council (S188)**

whose address for service is [acoughlan@fishandgame.org.nz](mailto:acoughlan@fishandgame.org.nz).
4. The particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)





Part	Position	Reason	Outcome
All parts of the submission that seek changes to water allocation provisions in Te Whanganui a Tara	Oppose	These parts are beyond the scope of PC1. Should it be determined that they are within the scope of PC1, WWL is opposed to them, as it supports the provisions as notified.	Reject
Requests to replace the phrase “where practicable” with “where possible” or other alternatives	Oppose	WWL supports the retention of the wording as notified.	Reject
Requests for shorter interim target attribute state timeframes	Oppose	WWL opposes any shortening of the TAS timeframes as notified.	Reject
Request for a new TAS for other waterbodies (bullet point 5)	Oppose	Any new TAS needs to be written to address the overarching issues identified by WWL for rivers. It is unclear what implications a new TAS for other waterbodies would have.	Reject
Functional need and effects management hierarchy (bullet point 4)	Oppose	The need to demonstrate functional need and to apply effects management hierarchy should not apply to Council water networks.	Reject
Outcomes for nutrients (bullet point 13)	Oppose	The implications of this amendment are not clear, and it requires comprehensive monitoring.	Reject
Objective WH.O7	Oppose	No information is provided about how this will affect WWL's activities.	Reject
Objective WH.O8	Oppose	PC1 as notified provides sufficient coverage of this issue.	Reject
Objective O19	Oppose	Clause (c) does not require strengthening.	Reject
Policy WH.P5	Oppose	PC1 as notified provides sufficient coverage of this issue.	Reject
Policy WH.P7	Oppose	PC1 as notified provides sufficient coverage of this issue.	Reject
5.4.8 R151A	Oppose	Permitted activity status is appropriate for diversions that come within the rule.	Reject
Policy WH.P15	Support in part	Financial contributions need to accurately reflect the costs of the improvements and upgrades to the stormwater system, and the provisions need to incorporate flexibility.	Accept

Policies P.P10 and WH.P10	Oppose	Financial and economic constraints are an important consideration when evaluating whether something is practicable. Also, functional need should not be embedded in this provision.	Reject
Policy P.P11	Oppose	The provision should not be based on whether discharge of contaminant was 'unavoidable', or on whether there is a demonstrated functional need.	Reject
Schedule 31 b and h	Oppose	Stakeholders are part of the community and do not require a specific mention.	Reject
Schedule 32(h)	Oppose	Stakeholders are part of the community and do not require a specific mention.	Reject

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

## Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

## How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
  - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
  - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).

Please send the Further Submission Form in by one of the below methods:

- Email it to the [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz).
- Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
- Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.


## Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter.  
Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Winstone Aggregates
Address for service: (Email, or physical address) Please note an <u>email address</u> is the preferred method	<a href="mailto:philip.heffernan@winstoneaggregates.co.nz">philip.heffernan@winstoneaggregates.co.nz</a>
Phone: (Optional)	[REDACTED]
Contact person for submission: (If different to above)	Phil Heffernan
I wish to be heard in support of my submission at a hearing:	Yes

I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes
<b>2. Criteria applicable to Further Submitter:</b>	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	No
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Winstone is potentially affected by the content of the submissions that it is submitting on.

<p><b>3. For the further submitter to action</b></p> <p>Service of your further submission:</p> <p>Please note that any person making a further submission <b>must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</b></p> <p>Each submitter has an address for service available at: <a href="http://www.gw.govt.nz/nrp-pc1-submissions">www.gw.govt.nz/nrp-pc1-submissions</a>. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>
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<b>4. Disclosures:</b>		
If submitting on behalf of a company / organisation: I confirm that I have permission to provide this information on behalf of the company / organisation		1/03/2024
<p><u>Public information:</u> Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website. In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the <a href="#">Plan Change 1 to the Natural Resources Plan Information Statement</a>. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at <a href="mailto:privacy@gw.govt.nz">privacy@gw.govt.nz</a>.</p>		

<p><b>5. Further Submission:</b></p> <ul style="list-style-type: none"> <li>The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Submitter</a></li> <li><a href="#">NRP PC 1 - Summary of Decisions Requested – By Provision</a></li> </ul> </li> <li>Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.</li> <li>If you are providing suggested text amendments to a provision, please do so in the following format: Suggested added text, shown as <b>bolded text</b> format Suggested deleted text, shown as <del>struckthrough</del> format</li> </ul>
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#### 4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

*Submitter name or, Submitter number of the submission you are commenting on:	*Submission point number: <i>Unique identifying number allocated to each specific submission point, located in the second column of the summary of decisions requested table:</i>	*Stance on the submission point: <i>(Support, Oppose, Oppose in part, Support in part, Not stated)</i>	*Decision sought: <i>(Allow, Disallow, Allow in part, or Disallow in part)</i>	Decision sought <i>Illustrate which aspects of this original submission that you support or oppose.  Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.</i>	Reasons: <i>Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.</i>
<b>S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies</b>					
S258 BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd - The Fuel Companies	S258.004	Support	Allow	Winstone seeks to allow the amendment 'redevelopment' to include an additional exemption for "resurfacing that does not involve re-direction of existing stormwater flows or drainage networks".	Winstone agree with the proposed exclusion of resurfacing that does not alter existing stormwater flows. This would partially resolve some of the concerns raised in Winstone's original Submission Point S206.028.
<b>S041 Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited</b>					
S041 Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	S41.002	Support	Allow	Winstone seeks to allow the deletion of Policy WH.P31.	Winstone agree with the concerns raised by the submitter which align with Winstone's original Submission Point S206.048.

S041 Chorus New Zealand Limited, Connexa Limited, Aotearoa Towers Group (trading as FortySouth), One New Zealand Group Limited and Spark New Zealand Trading Limited	S41.005	Support	Allow	Winstone seeks to allow the deletion of clause (b) of Rule WH.R24.	Winstone agree with the concerns raised by the submitter which align with Winstone's original Submission Point S206.060.  Note: The summary of the decision requested does not show the proposed deletion of clause (b).
<b>S285 Civil Contractors New Zealand</b>					
S285 Civil Contractors New Zealand	S285.003	Support in part	Allow in part	Winstone seeks to allow relief that Greater Wellington Regional Council provide further direction on appropriate locations and conditions for cleanfill sites. In addition, Winstone seek that this direction also be provided for quarrying activities.	Winstone agree with the general submission point. There is a lack of appropriate locations for both cleanfill and quarry sites throughout the Wellington Region. With increasing demand for aggregate resource, there must be appropriate provision for those activities in the Natural Resources Plan. Further detail on this point has been provided in Winstone's original submission.
S285 Civil Contractors New Zealand	S285.019	Support	Allow in part	Winstone seek to allow the relief sought that Policy WH.P29 is either deleted or amended to ensure appropriate exemptions are provided. Should policy be amended, Winstone seek that quarrying activities are specifically identified in the exemptions.	Winstone agree with the intent of the relief sought by the submitter which is the earthworks provisions must appropriately enable necessary activities to continue over the winter months. While Winstone support 'regionally significant infrastructure' being a qualifier for this, if the relief is accepted, Winstone seek that it also provides for other necessary

					activities including 'quarrying activities.
<b>S219 Cuttriss Consultants Ltd</b>					
S219 Cuttriss Consultants Ltd	S219.001	Support	Allow	Winstone seek to allow for relief and to insert a definition of 'greenfield development'.	Winstone agree with the concerns raised by the Submitter and that a definition for greenfield development is necessary. Winstone would support either the definition proposed by the Submitter, or the definition proposed by Winstone in original Submission Point S206.001.
S219 Cuttriss Consultants Ltd	S219.012	Support	Allow	Winstone seek that relief sought is allow and Policy WH.P31 is deleted.	Winstone support the proposed exclusion of resurfacing that does not alter existing stormwater flows. This would partially resolve some of the concerns raised in Winstone's original Submission Point S206.028.
<b>S222 Environmental Defence Society Inc.</b>					
S222 Environmental Defence Society Inc.	S222.022	Oppose	Disallow	Winstone seek that relief sought is not allowed and that the existing timeframe of 2100 is retained.	Winstone oppose reducing the timeframe. Winstone note that the direction of WH.O1 anticipates significant land use change to achieve that long term vision. This form of change must occur progressively over a long time period. Winstone support the existing timeframe of 76 years and notes that any reduction (including the Submitters proposed 26 years) will limit the ability to achieve the outcomes sought.

S222 Environmental Defence Society Inc.	S222.023	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 Environmental Defence Society Inc.	S222.027	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period



					(to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 Environmental Defence Society Inc.	S222.028	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 Environmental Defence Society Inc.	S222.031	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time

					period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 (Environmental Defence Society Inc.)	S222.032	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose including reference to natural form and character in the objective. The restoration of natural character is not identified in the NPS-FM and is not appropriately measurable for the purpose of setting target attribute states. Restoration is also unlikely to be reasonably achievable.
S222 (Environmental Defence Society Inc.)	S222.034	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose including reference to natural form and character in the objective. The restoration of natural character is not identified in the NPS-FM and is not appropriately measurable for the purpose of setting target attribute states. Restoration is also unlikely to be reasonably achievable.
S222 Environmental Defence Society Inc.	S222.038	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose altering the timeframe to 2030. While Winstone support setting aspirational targets for meeting Target Attribute States, Winstone raises concern whether targets are realistically achievable. Winstone note that the

					improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.
S222 (Environmental Defence Society Inc.)	S222.057	Oppose	Disallow	Winstone seek that relief sought is not allowed and that the activity status for WH.R17 remains permitted.	Winstone oppose modifying the activity status. The permitted status, subject to the proposed conditions, will ensure that adverse effects are appropriately managed. Requiring consent for all vegetation clearance will result in unreasonable consenting cost and delay.
S222 (Environmental Defence Society Inc.)	S222.058	Oppose	Disallow	Winstone seek that relief sought is not allowed and that the activity status for WH.R18 remains controlled.	Winstone oppose modifying the activity status. The controlled activity status subject to the to the conditions and matters of control appropriately manage effects to erosion prone land while providing sufficient certainty to landowners. Increasing the activity status will result in further uncertainty and an unreasonably onerous consenting process.
S222 (Environmental Defence Society Inc.)	S222.063	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose increasing the setback. The setback provided in the notified rule is consistent with the setback for earthworks provided for

					in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.
<b>S261 Forest &amp; Bird</b>					
S261 Forest & Bird	S261.049	Oppose	Disallow	Winstone seek that relief sought is not allowed.	<p>Winstone oppose including reference to 'ephemeral watercourses'. The definition of 'ephemeral watercourse' in the NRP is very broad and would include gullies and indents in landscapes, all of which are not mapped or easily defined, making enforceability problematic. Winstone also questions how the health and wellbeing of ephemeral waterbodies will be measured due to their nature. Winstone note that ephemeral waterbodies from part of the wider river system and therefore their general function would already be anticipated in the current direction.</p> <p>Winstone oppose altering the timeframe to 2050. Winstone support the existing timeframe of 76 years and notes that any reduction (including the Submitters proposed 26 years) will limit the ability to achieve the outcomes sought.</p>
S261 (Forest & Bird)	S261.050	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose including reference to 'ephemeral watercourses'. The definition of 'ephemeral watercourse' in the NRP is very broad and would include gullies and indents

					<p>in landscapes, all of which are not mapped or easily defined. Winstone also questions the practicality of assessing target attribute states in systems that are temporary and changeable. Winstone note that ephemeral waterbodies from part of the wider river system and therefore their general function would already be anticipated in the current direction.</p> <p>Winstone oppose altering the timeframe to 2030. Winstone note that the improvements required through Plan Change 1 already require a significant land use change over a short time period (16 years). Notwithstanding Winstone's concerns over whether the current targets can be realistically achieved (see Submission Point S206.034), reducing the time period (to 6 years) would require further significant land use change that is unlikely to align with community aspirations.</p> <p>Winstone oppose including reference to natural form and character. The restoration of natural character is not identified in the NPS-FM and is not appropriately measurable for the purpose of setting target attribute states. Restoration is also unlikely to be reasonably achievable.</p>
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S261 (Forest & Bird)	S261.075	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose the replacement of “practicable” with “possible”. This would set an unreasonably high threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.
S261 Forest & Bird	S261.090	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose increasing the setback. The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.  Winstone oppose including reference to ‘ephemeral watercourses’. The definition of ‘ephemeral watercourse’ in the NRP is very broad and would include gullies and indents in landscapes, all of which are not mapped or easily defined. This would result in significant constraints for undertaking earthworks on any sloping land.
S261 Forest & Bird	S261.110	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose setting a setback for vegetation clearance. The setback provided in the notified rule is consistent with the setback for earthworks provided for in the operative NRP. It is unclear what setback is requested by the submitter, and what justification there is for any increased setback.

					Winstone oppose including reference to 'ephemeral watercourses'. The definition of 'ephemeral watercourse' in the NRP is very broad and would include gullies and indents in landscapes, all of which are not mapped or easily defined. This would result in significant constraints for undertaking earthworks on any sloping land.
S261 Forest & Bird	S261.116	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Setback will result in significant constraints for development within a site. Note that this includes ephemeral waterbodies which is very broad.
S261 (Forest & Bird)	S261.117	Oppose	Disallow	Winstone seek that relief sought is not allowed.	Winstone oppose modifying the activity status. The restricted discretionary activity status subject to the to the conditions (notwithstanding Winstone's proposed changes) and matters of discretion appropriately manage effects. Increasing the activity status will result in further uncertainty and an unreasonably onerous consenting process.
<b>S43 Fulton Hogan</b>					
S43 Fulton Hogan	S43.007	Support	Allow	Winstone seek that relief sought is allowed and clause (b) is amended to replace "to a more natural level" to "in	Winstone support the proposed changes to the objective. Winstone agree that it is not clear on what the baseline for reducing sediment is to.

				comparison to the levels as at 1 November 2023".	
<b>S238 Greater Wellington Regional Council</b>					
S238 Greater Wellington Regional Council	S238.002	Support in part	Allow in part	Winstone seek that relief sought is allowed, subject to specific exclusion of quarrying zone (as a special purpose zone)	Winstone agree that it is ambiguous what is intended by 'urban zones' with relation to the definition of unplanned greenfield development. Winstone support an additional definition of urban zones. However, Winstone note that the proposed definition includes "special purpose zones" which would include quarry extractive zones. The definition does provide an exception for where it can be proved that the zone can be proved to be a rural zone, which a quarry zone would likely met, but to provide certainty Winstone seek that the definition be explicit that quarry zones are not urban zones.
<b>S211 Hutt City Council</b>					
S211 Hutt City Council	S211.007	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone fully support the submission. The Submitter has provided a robust assessment of the feasibility of meeting the 2040 timeframe. Winstone is concerned that this assessment was not provided upfront by Greater Wellington with the Section 32 evaluation. Winstone does raise that similar analysis should be undertaken by Greater Wellington for meeting all



					targets by the 2040 timeframe. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” <sup>1</sup> .
S211 Hutt City Council	S211.008	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone fully support the submission. The Submitter has provided a robust assessment of the feasibility of meeting the 2040 timeframe. Winstone is concerned that this assessment was not provided upfront by Greater Wellington with the Section 32 evaluation. Winstone does raise that similar analysis should be undertaken by Greater Wellington for meeting all targets by the 2040 timeframe. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” <sup>2</sup> .
S211 Hutt City Council	S211.009	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone fully support the submission. The Submitter has provided a robust assessment of the feasibility of meeting the 2040 timeframe. Winstone is concerned that this assessment was not provided upfront by Greater Wellington with the Section 32 evaluation. Winstone does raise that

<sup>1</sup> Clause 3.3(2)

<sup>2</sup> Clause 3.3(2)

					similar analysis should be undertaken by Greater Wellington for meeting all targets by the 2040 timeframe. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” <sup>3</sup> .
<b>S257 Kāinga Ora</b>					
S257 Kāinga Ora	S257.004	Support	Allow	Winstone seek that relief sought is allowed and that “hydrological control” is further clarified.	Winstone support further clarification of hydrological control. Winstone agree that there is currently insufficient understanding of what a hydrological control is.
S257 Kāinga Ora	S257.028	Support	Allow	Winstone seek that relief sought is allowed and the impervious surface threshold is increased to 5000 m <sup>2</sup> .	Winstone support the proposed increase to the impervious surface threshold. Winstone note that the threshold must reasonably anticipated appropriate redevelopment.
<b>S286 Taranaki Whānui</b>					
S286 Taranaki Whānui	S286.062	Support	Allow	Winstone seek that relief sought is allowed and Policy WH.P31 is deleted.	Winstone support the deletion of Policy WH.P31. Notwithstanding Winstone’s concerns as detailed in Original Submission Point S206.048, Winstone agree that managing the

<sup>3</sup> Clause 3.3(2)

					timing of earthworks is best placed to a condition of consent.
<b>S033 Wellington City Council</b>					
S033 Wellington City Council	S33.024	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone support altering the timeframe to 2060. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” <sup>4</sup> . Winstone consider that 2060 would meet this direction.
S033 Wellington City Council	S33.028	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone support altering the timeframe to 2060. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” <sup>5</sup> . Winstone consider that 2060 would meet this direction.
S033 Wellington City Council	S33.031	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone support altering the timeframe to 2060. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” <sup>6</sup> . Winstone consider that 2060 would meet this direction.
S033 Wellington City Council	S33.043	Support	Allow	Winstone seek that relief sought is allowed and that Policy WH.P10 is amended to reflect that the NRP only	Winstone agree with the submitter. The proposed changes are unnecessarily duplicating land use activities associated with stormwater.

<sup>4</sup> Clause 3.3(2)

<sup>5</sup> Clause 3.3(2)

<sup>6</sup> Clause 3.3(2)

				manages the discharge and not the land use activities.	It is also questioned whether the management of land use is a function of the regional council under Section 30 of the RMA.
<b>S151 Wellington Water Ltd</b>					
S151 Wellington Water Ltd	S151.004	Support	Allow	Winstone seek that relief sought is allowed and further consideration is given to whether the timeframe is realistically achievable.	Winstone support altering the timeframe to 2060. Winstone note that the National Policy Statement for Freshwater require the long-term visions to be to be “ambitious <u>but reasonable</u> ” <sup>7</sup> . Winstone consider that 2060 would meet this direction.
S151 Wellington Water Ltd	S151.033	Support in part	Allow in part	Winstone seek that relief sought is allowed and that additional social, economic, cultural and environmental benefits are recognised.	Winstone support the proposed changes to the objective. Winstone note that there are additional social, economic, cultural and environmental benefits that should be recognised, including quarrying activities / regionally significant minerals.
<b>S245 Tama Potaka, Minister of Conservation</b>					
S245 Tama Potaka, Minister of Conservation	S245.001	Support	Allow	Winstone seek that relief sought is allowed and Objective WH.O1 is amended to replace “all freshwater bodies have planted margins” to “all freshwater bodies have vegetated margins where practicable”.	Winstone support the amendment to the objective. This aligns with relief sought by Winstone in Original Submission Point S206.032.

<sup>7</sup> Clause 3.3(2)

7 March 2023

Greater Wellington Regional Council  
Environmental Policy  
PO Box 11646  
Manners St  
WELLINGTON 6142,

**Attention: WRC Hearings Advisor**  
**Via email: regionalplan@gw.govt.nz**

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**FURTHER SUBMISSION TO GWRC PLAN CHANGE 1 TO NATURAL RESOURCES PLAN**  
**Form 6, Clause 8 of the First Schedule, RMA**

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**1. DETAILS OF FURTHER SUBMITTER**

**Name of Submitter:** Woodridge Holdings Ltd

**Address for service:** Simplify Planning Ltd



Attn: Rhys Phillips

**Email:** [rhys@simplifyplanning.co.nz](mailto:rhys@simplifyplanning.co.nz)

**We wish to be heard in support of my submission at a hearing.**

**We would consider presenting a joint case at the hearing with others who make a similar submission.**

**2. CRITERIA APPLICABLE TO FURTHER SUBMITTER:**

Woodridge Holding Ltd has an interest in the proposal that is greater than the interest the general public as PC1 directly affects their day to day operations.

**3. FURTHER SUBMITTER ACTION**

A copy of this submission will be served on the relevant original submitters no later than five working days after this submission to Greater Wellington.

**4. DISCLOSURES:**

We confirm that we have permission to provide this information on behalf of Woodridge Holdings Ltd.

## 5. FURTHER SUBMISSION POINTS:

Woodridge Holding Ltd's further submission is provided in the table below.

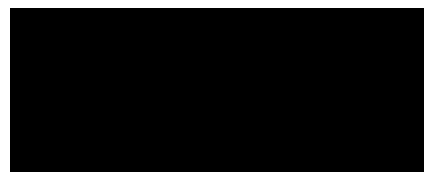
For clarity, Woodridge Holdings Ltd did not have sufficient time to review all 170 submissions and all 941 pages of the summary of submissions in detail. As a result, we focused on the points most relevant to Woodridge Holdings Ltd and the submissions we could support rather than the submissions we oppose.

**Our overall view is that there are so many issues with PC1 that the only viable option is to withdraw it and start again using the feedback on PC1 to inform the next draft plan change.**

Some of the key issues noted in the further submission below are that:

- Inadequate consultation was undertaken before PC1 was notified and as a result, PC1 is contrary to Subpart 1/Clause 3.2(1) of the NPS-FW.
- The large number of significant issues with PC1 is a clear indication that there was a lack of meaningful consultation (as required by the NPS-FM) and that the preparation of PC1 was rushed.
- There is a disconnect between the outcomes being sought by GW via PC1 and those being sought by TAs giving effect to the NPS-UD. Even though the NPS-FW and the NPS-UD have the same status under the RMA.
  - PC1 conflicts with the intended outcomes of the NPS-UD, being to provide for well-functioning urban environments, including both through infill and greenfield developments.
  - PC1 will have significant consequences for affordability of housing and land development in Wellington Region and is inconsistent with Objective 2 and the associated policies of NPS-UD.
  - The use of the prohibited activity rule for greenfield development is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8.
- The Section 32 report which ignores the housing affordability implications of the proposed changes.
- There is insufficient detail on the types of hydrological controls required for various types and scales of development for a plan change with immediate effect.
- PC1 overlaps with TA responsibilities under the RMA.
  - TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.
  - PC1 Rule WH.R5 would require all brownfield developments to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.
  - TA's are already controlling the use of copper and zinc building materials.
- Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.
- Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects and may impact upon their viability. This was not considered in the s32 analysis.
- Financial contributions are required to offset all residual adverse effects regardless of scale is inconsistent with the RMA which only requires mitigation of residual adverse effects that are more than minor.

Dated at Wellington on 7 March 2024



Signature:

**Rhys Philips, Senior Planner**

**For Simplify Planning Ltd on behalf of the submitted Woodridge Holdings Ltd**

## General comments

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S219 Cuttriss Consultants Ltd	S219.002 S219.003 S219.004 S247.002 S247.003 S247.004 S219.005 S247.005	General comments - consultation	Allow	Withdraw PC1	<p>Agree that inadequate consultation was undertaken before PC1 was notified. As a result, PC1 is contrary to Subpart 1/Clause 3.2(1) of the NPS-FW which specifies that:</p> <p><i>“Every regional council <b>must engage with communities</b> and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region.”</i></p> <p>A draft should have been released for consultation with the community, including the development community. Doing so would limit appeals and ensure a more workable less idealistic document is prepared.</p>
S254 Best Farm Ltd	S254.001 S254.002 S254.003 S254.004	General comments - consultation	Allow	Withdraw PC1	<p>There is a disconnect between the outcomes being sought by TAs giving effect to the NPS-UD and PC1. Even though the NPS-FW and the NPS-UD have the same status under the RMA.</p>
S243 Land Matters Limited	S243.033 S243.034	General comments - consultation	Allow	Withdraw PC1	<p>PC1 conflicts with the intended outcomes of the NPS-UD, being to provide for well-functioning urban environments, including both through infill, and greenfield developments. NPS-UD Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been adequately assessed.</p>
S225 Upper Hutt City Council	S225.025	General comments - overall	Allow	Withdraw PC1	<p>The number of significant issues with PC1 is a clear indication that there was a lack of meaningful consultation (as required by the NPS-FM) and that its preparation was rushed.</p> <p>The imposition of new rules with immediate legal effect is inconsistent with subpart 1 of the NPS-FM. As there is still a significant amount of time before the plan change must be notified (31st December 2024) and the new government is proposing changes so it should be withdrawn.</p>
S219 Cuttriss Consultants Ltd	S219.001	General comments - definitions	Allow	Add definition of greenfield development	<p>A definition of 'greenfield development' is required to provide certainty regarding the application of new rules particularly for the application of Rules WH.R6 and P.R6.</p>
S239 Orogen Limited	S239.002	General comments - definitions	Allow	Add definition of 'greenfield development'	<p>The final definition should be prepared in consultation with relevant stakeholders.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S248 Ara Poutama Aotearoa the Department of Corrections	S248.007	General comments - definitions	Allow	Include definitions for terms including "raingarden" and "bioretention device".	Definitions of "raingarden" and "bioretention device" are required in order to understand PC1.
S177 Transpower New Zealand Limited	S177.022	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Allow		
S59 Upper Hutt Rural Communities - Bob Anker	S59.008	General comments - economic cost/impact	Allow	Withdraw PC1 and Complete a cost- benefit analysis	The section 32 analysis does not adequately quantify the economic, environmental, and cultural costs and benefits of introducing such wide-ranging changes with immediate legal effect, including the cost of projects which are in construction and/or budgeted for this earthworks season but which have no allocated funding for additional consents and/or more restrictive working conditions.  PC1 will have significant consequences for affordability of housing and land development in Wellington Region. The significant financial contribution for new residential units will have flow on housing affordability effects in the region and is inconsistent with Objective 2 and associated policies of NPS-UD. This has not been considered in the Section 32 report which ignores the housing affordability implications of the proposed changes.
S275 The New Zealand Transport Agency	S275.001	General comments - overall	Allow	Withdraw PC1 and Complete a cost- benefit analysis	
S161 Gillies Group Management Ltd	S161.006	General comments - stormwater management	Allow	Withdraw PC1	There is insufficient detail on the types of hydrological controls required for various types and scales of development.  The standards pose significant burdens on property owners and developers.
S219 Cuttriss Consultants Ltd	S219.002	General comments - overall	Allow	Withdraw PC1	Engineering advice should not be necessary for the creation of small impervious areas.  PC1 does not adequately evaluate financial costs on landowners, developers and ratepayers, including flow-on costs on the commercial viability of housing supply and affordability.
S33 Wellington City Council	S33.005	General comments - stormwater management	Allow	Withdraw PC1	The proposed framework for managing the effects of stormwater runoff from development is already or will be regulated through TA's district plans and this would lead to applicants going through two different consenting processes. Stormwater runoff from development should be regulated at the TA level only.



Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.008	Unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent TAs from meeting their ongoing requirements under the NPS-UD.
S211 Hutt City Council	S211.004 S211.005	General comments - urban development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	This provision is likely to lead to unintended consequences.  Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.
S169 Koru Homes NZ Ltd	S169.050	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.
S225 Upper Hutt City Council	S225.014 S225.026	General comments - urban development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.  The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore prohibited activity status inappropriate.
S265 The Maymorn Collective	S265.002	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.
S240 Porirua City Council	S240.004 S240.014	General comments - overall	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility due to not implementing the higher order documents, and any section 32 analysis would be at risk of identifying development as being contrary to objectives and policies in these plans.
S33 Wellington City Council	S33.004 S33.018	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.
S161 Gillies Group Management Ltd	S161.005	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S169 Koru Homes NZ Ltd	S169.005	General comments - unplanned greenfield development	Allow	Withdraw PC1 or remove prohibited activity status for greenfield development.	
S240 Porirua City Council	S240.008	General comments - overall	Allow	Request that Greater Wellington convert both the PC1 and the NRP to an eplan format as soon as practicable to enable plan users to efficiently find information	The PDF format of PC1 and the NRP, with no hyperlinked definitions and with A4 maps in appendices, is out of step with current technology and best practice where plans are presented in digital formats. PC1 and the NRP should be converted to a plan format will improve regulatory compliance and reduce costs through time savings for plan users.
S101 Wellington International Airport Limited	S101.017	Whaitua	Allow	A digital map be should be included which clearly delineates the boundaries of each Whaitua, including both coastal and landward areas.	insert a new planning map which clearly delineates all of the whaitua, including both coastal and landward areas of each one.
S243 Land Matters Limited	S243.036	General comments - urban development	Allow	Remove the new requirements for stormwater management and financial contributions from all new stormwater discharge provisions or amended to provide a more balanced approach to catchment management.	PC1 introduces increased uncertainty and cost to the provision of housing in Wellington region, directly affecting housing affordability. The requirement for financial contributions and risk cost introduced through additional consenting will have flow on effects to the cost of housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.
S33 Wellington City Council	S33.003	General comments - water quality	Allow	Remove all requirements in relation to brownfield sites.	WCC is already engaging in multiple statutory and non-statutory processes in processes to achieve water quality improvements. PC1 would require all brownfield development to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.
S225 Upper Hutt City Council	S225.018	General comments - water quality improvements	Allow	Delete all provisions which result in a requirement to seek three waters infrastructure consents from both GW and TA's.	PC1 would require all brownfield development to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication. Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.

## Interpretation

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S120 Akatarawa Valley Residents	S120.008	Earthworks	Allow	Provide one definition for earthworks for the region.	The cost and time implications of the "Earthworks" definition do not appear to have been thought through or considered in the s32 analysis.
S239 Orogen Limited	S239.003	Earthworks	Allow	Amend the definition of earthworks to account for the issues raised by the submitters. Including the provision of the previous exceptions, for low-risk and essential activities such as the installation, upgrading and maintenance of services and roads.	
S254 Best Farm Ltd	S254.005	Earthworks	Allow		
S274 Goodman Contractors Limited	S274.001	Earthworks	Allow		
S275 The New Zealand Transport Agency	S275.003	Earthworks	Allow		
S225 Upper Hutt City Council	S225.033	Erosion and sediment management plan	Allow	The "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region" should be consistently referred to.	Consistent application of a single set of standards is necessary to ensure a consistent approach to this issue.
S33 Wellington City Council	S33.012	mpervious surfaces	Allow	Delete definition or amend to align with TA's following consultation.	Definition is complex and difficult to implement.  Impermeable surfaces (permeability) is also a matter of consideration for District Plans as set out in 80E of the RMA and 3.5(4) of the NPS-FM.  Roofs and other surfaces which discharge via a hydraulic neutrality device in accordance with the relevant TA rules should be excluded from the definition.
S161 Gillies Group Management Ltd	S161.008	mpervious surfaces	Allow		
S240 Porirua City Council	S240.011	mpervious surfaces	Allow		
S33 Wellington City Council	S33.013	Redevelopment	Allow	Amend the definition taking into account for the issues raised by the submitters.	The proposed definition is unreasonable. It does not take into consideration the need to intensify development in urban areas and overlaps with the functions of territorial authorities and the consideration for stormwater management as set out in 80E of the RMA and 3.5(4) of the NPS-FM.  The definition does not work in the context of the NPS-UD and conflicts with the Policies of PC1. For example Policy WH.P2 seeks to "encourage"
S38 Summerset Group Holdings Limited	S38.003	Redevelopment	Allow	Delete all associated rules requiring additional consents from GW for consent for development.	

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S151 Wellington Water Ltd	S151.024	Redevelopment	Allow	If the above is not done provided exemptions for maintenance, extensions and alterations. Make it clear that these rules do not apply when the redeveloped of site does not increase the permitted hard surfacing on the site ie: the current hard surfacing + and allowance provide for under the definition and/or rules.	<p>redevelopment, but associated provisions, including this definition do not permit the associated increases in impervious surfaces that would be expected with the use of this term in a policy.</p> <p>WH.R4 refers to "redevelopment of existing impervious surfaces" which implies that the definition of redevelopment is inclusive of maintenance of existing impervious surfaces.</p> <p>The definition should exclude minor alterations and additions to existing buildings to provide for the small redevelopment of existing sites as a permitted activity in associated rules.</p> <p>Except where required in relation to heritage buildings, zinc or copper roofs should be excluded from the final exception clause.</p> <p>Concerned about implications definition may have on business-as-usual activities undertaken by territorial authorities and infrastructure providers.</p> <p>What does "minor maintenance or repairs to roads, carparking areas, driveways and paving" mean?</p> <p>It is egregious to require 'like for like' replacements and renewals. Redevelopment of a site should be permitted provide the overall impervious surface area is not increased.</p>
S161 Gillies Group Management Ltd	S161.009	Redevelopment	Allow		
S219 Cuttriss Consultants Ltd	S219.007	Redevelopment	Allow		
S225 Upper Hutt City Council	S225.041	Redevelopment	Allow		
S240 Porirua City Council	S240.013	Redevelopment	Allow		
S247 Carrus Corporation Ltd	S247.007	Redevelopment	Allow		
S257 Kāinga Ora	S257.006	Redevelopment	Allow		

## Beds of lakes and rivers

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S225 Upper Hutt City Council	S225.050	Beds of lakes and rivers general conditions.	Allow	Retain as operative, do not amend as proposed.	The amendment to point (n) implies that works could not be undertaken if identified birds are in the area for any purpose. As some birds may nest year round this clause may prevent the maintenance or construction of significant infrastructure even outside the critical period.

## Other Methods

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S240 Porirua City Council	S240.016	Method M36: Freshwater Action Plan programme.	Allow	Amend so that FAP's cannot be developed or amended without formal engagement of the relevant stakeholders, including relevant landowners, catchment communities and TAs.	<p>Amend for consistency with NPS-FM.</p> <p>Amend this and all policies so that FAPs cannot be developed or amended without formal engagement of the relevant stakeholders, catchment communities and TAs. noting that Subpart 1/Clause 3.2(1) of the NPS-FW which specifies that:</p> <p><i>“Every regional council <b>must engage with communities and tangata whenua</b> to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region.”</i></p>
S193 Wairarapa Federated Farmers	S193.050	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	Allow		
S240 Porirua City Council	S240.017	Method M38: Freshwater Action Plan for the Rangituhi catchment.	Allow		
S193 Wairarapa Federated Farmers	S193.053	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Allow	Amend this and all other methods so that FPAP's cannot be developed or amended without formal engagement of the relevant stakeholders, including relevant landowners, catchment communities and TAs.	

## Whaitua Te Whanganui-a-Tara

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.005	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow	Amend policy so that greenfield developments are not prohibited.	<p><i>The use of a prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent territorial authorities from meeting its ongoing requirements under the NPS-UD.</i></p> <p><i>This provision is likely to lead to unintended consequences.</i></p> <p><i>Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.</i></p>
S161 Gillies Group Management Ltd	S161.011	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		<p><i>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</i></p> <p><i>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</i></p> <p><i>As the s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, prohibited activity status inappropriate.</i></p>
S169 Koru Homes NZ Ltd	S169.006	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		<p><i>The requirement for two plan changes to enable greenfield development will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</i></p> <p><i>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan changes an impossibility as they would likely be identified as being contrary to objectives and policies of the higher order planning framework set up by GW via PC1.</i></p>
S211 Hutt City Council	S211.010	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		<p><i>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</i></p>
S219 Cuttriss Consultant s Ltd	S219.009	Policy WH.P2 Management of activities to	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		achieve target attribute states and coastal water objectives.			
S225 Upper Hutt City Council	S225.067	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		
S247 Carrus Corporation Ltd	S247.009	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Allow		
S33 Wellington City Council	S33.036	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Allow	Amend so that FAP's cannot be developed or amended without formal engagement of the relevant stakeholders, including relevant andowners, catchment communities and TAs.	Amend for consistency with NPS-FM noting that Subpart 1/Clause 3.2(1) of the NPS-FW which specifies that: <i>"Every regional council <b>must engage with communities</b> and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region."</i>
S33 Wellington City Council	S33.042	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	Allow	Amend policy to clarify GWRC role is managing copper and zinc contamination.	Management of copper and zinc contamination is currently managed by District Plans. As a result, there is no need for PC1 to contains rules regarding this issue. All that is required is appropriate objectives and policies which the TA can implement via the rules in the District Plans.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.006	Policy WH.P10: Managing adverse effects of stormwater discharges.	Allow	Review policy and rule framework for the treatment of stormwater and provide technical standards for acceptable solutions.	PC1 lacks sufficient detail on the types of hydrological controls and water sensitive designs required for various types and scales of development.  Compliance with this policy will be difficult and will require expensive bespoke solutions as there are no technical guidelines/compliant solutions incorporated into the plan change. For example, the creation of small areas of impervious surfaces should not require engineering advice to design site specific controls.  The cost of this approach on landowners/developers and the impacts on housing supply in the region has not been sufficiently assessed in the Section 32 Evaluation.
S161 Gillies Group Management Ltd	S161.012	Policy WH.P10: Managing adverse effects of stormwater discharges.	Allow		
S211 Hutt City Council	S211.013	Policy WH.P10: Managing adverse effects of stormwater discharges.	Allow		
S33 Wellington City Council	S33.046	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words "from new greenfield developments" and lowering all treatment targets.	The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.  Stormwater discharges are already managed via global stormwater discharge consents, and TAs manage land use and therefore stormwater discharges via the land use consent process.  The proposed regional plan rule framework duplicates consenting requirements. GWRC should focus on higher-level management of discharge consents.
S243 Land Matters Limited	S243.005	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	Allow		Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region.  The practicalities of complying with this policy needed to be thoroughly assessed before PC1 was released, including via consultation with affected parties. There will be instances where it is not practicable to achieve hydrological controls due to topographical, geotechnical, and other constraints.  Ready made 'acceptable solutions' should have been developed and included in PC1.



Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.047	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words "from new greenfield developments" and lowering all treatment targets.	<p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.</p>
S38 Summerset Group Holdings Limited	S38.008	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Allow		<p>TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.</p> <p>The proposed financial contribution will decrease housing affordability.</p> <p>A mandatory flat fee financial contribution may incentivise large lots over intensification.</p>
S161 Gillies Group Management Ltd	S161.013	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Allow		
S33 Wellington City Council	S33.048	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow	Delete policy.	<p>No greenfield development is every 'unplanned" as they must go through a TA plan change and/or resource consent process. As a result, this terminology is misleading.</p> <p>As there is no way to entirely "avoid" all new stormwater discharges this policy could never be complied with. In effect a prohibition of greenfield development. Such an approach is not necessary to achieve the objectives and policies of the NPS-FM 2020 and is contrary to the NPS-UD.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.009	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		This policy conflicts with the intended outcomes of the NPS-UD to provide for well-functioning urban environments, including both through infill, and greenfield developments. Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been assessed.
S219 Cuttriss Consultants Ltd	S219.011	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		This provision is likely to lead to unintended consequences. The policy will negatively affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.  The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan changes an impossibility as they would likely be identified as being contrary to objectives and policies of the higher order planning framework set up by GW via PC1.
S225 Upper Hutt City Council	S225.079	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.
S243 Land Matters Limited	S243.007	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		
S247 Carrus Corporation Ltd	S247.011	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Allow		
S257 Kāinga Ora	S257.021	Policy WH.P16: Stormwater	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		discharges from new unplanned greenfield development.			
S225 Upper Hutt City Council	S225.092	Policy WH.P30: Discharge standard for earthworks.	Allow	Delete policy or amend to be a policy rather than a rule or standard	This policy is written in the form of a rule or standard rather than outlining how an objective will be implemented.
S161 Gillies Group Management Ltd	S161.015	Policy WH.P31: Winter shut down of earthworks.	Allow	Delete policy and make earthworks great than 3,000m <sup>2</sup> between 1 June and 30 September a Discretionary Activity.	This policy is written in the form of a rule or standard rather than outlining how an objective will be implemented. The current method of site-specific assessments during winter works is achieving the objectives of the NPS-FW.
S211 Hutt City Council	S211.017	Policy WH.P31: Winter shut down of earthworks.	Allow		Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.
S219 Cuttriss Consultants Ltd	S219.012	Policy WH.P31: Winter shut down of earthworks.	Allow		
S225 Upper Hutt City Council	S225.093	Policy WH.P31: Winter shut down of earthworks.	Allow		
S239 Orogen Limited	S239.004	Policy WH.P31: Winter shut down of earthworks.	Allow		
S243 Land Matters Limited	S243.019	Policy WH.P31: Winter shut down of earthworks.	Allow		
S247 Carrus Corporation Ltd	S247.012	Policy WH.P31: Winter shut	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		down of earthworks.			
S248 Ara Poutama Aotearoa the Department of Corrections	S248.028	Policy WH.P31: Winter shut down of earthworks.	Allow		
S286 Taranaki Whānui	S286.062	Policy WH.P31: Winter shut down of earthworks.	Allow		
S33 Wellington City Council	S33.060	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	Allow	Delete	<p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>PC1 Rule WH.R5 would require all brownfield developments to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.</p> <p>Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.</p> <p>Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.</p> <p>(a) Should be deleted as it discourages development of large brownfield sites. This is something which should be encouraged. Especially as GW is effectively preventing any future greenfield development.</p> <p>(b) Should be deleted as the materials used are controlled by TAs. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.</p> <p>(c) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.</p>
S151 Wellington Water Ltd	S151.093	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow	f not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	
S161 Gillies Group Management Ltd	S161.018	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S209 Enviro NZ Services Ltd (Enviro NZ)	S209.020	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		<p>(c)(i) Is somewhat ironic. Why is it necessary to implement hydrological controls for greenfield development. when PC1 effectively bans them.</p> <p>(c)(ii) applies equally to existing and new impervious surfaces &gt;30m<sup>2</sup>. So, in effect any redevelopment (eg relaying a section of a drive) or new work (installing a carpad) &gt;30m<sup>2</sup> would require a GW consent.</p>
S219 Cuttriss Consultant s Ltd	S219.015	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		<p>Clause (c) is too vague as it does not specify what the hydrological controls have to achieve and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of mpervious areas of 31m<sup>2</sup>.</p> <p>The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices.</p>
S225 Upper Hutt City Council	S225.098	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		<p>Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects, and may impact upon their viability. This was not considered in the s32 analysis.</p>
S238 Greater Wellington Regional Council	S238.011	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S239 Orogen Limited	S239.005	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S243 Land Matters Limited	S243.020	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S247 Carrus Corporation Ltd	S247.015	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
257 Kāinga Ora	S257.028	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.061	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow	Delete	<p>WH.R6 is somewhat ironic. Why is it necessarily have a controlled rule for new greenfield impervious surfaces when PC1 effectively bans them?</p> <p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.</p>
S38 Summerset Group Holdings Limited	S38.014	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.</p> <p>(a) Should be deleted as it discourages development of large brownfield sites. This is something which should be encouraged. Especially as GW is effectively preventing any future greenfield development.</p>
S169 Koru Homes NZ Ltd	S169.014	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>(b) Any new or replaced hard surface area &gt;30m<sup>2</sup> is unable to comply with WH.R5.(c)(ii). As a result WH.R6(b) requires a controlled activity consent for all new or replacement impervious surfaces between 30m<sup>2</sup> and 1,000m<sup>2</sup>.</p> <p>(c) Requiring Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only require mitigation where residual adverse effects that are more than minor.</p>
S243 Land Matters Limited	S243.021	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>(d) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.</p> <p>(e) Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region.</p> <p>The practicalities of complying with this Policy needed to be thoroughly assessed before PC1 was releases, including via consultation with affected parties. There will be instances where it is not practicable to achieve hydrological controls due to</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.016	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>topographical, geotechnical and other constraints.</p> <p>Ready made 'acceptable solutions' should have been developed and included in PC1.</p> <p>s too vague as it does not specify what the hydrological controls have to achieve and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of impervious areas of 31m<sup>2</sup>.</p>
S247 Carrus Corporation Ltd	S247.017	Rule WH.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		<p>The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices.</p> <p>Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects, and may impact upon their viability. This was not considered in the s32 analysis.</p>
S33 Wellington City Council	S33.062	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Allow		<p>Hydrological controls should not be required if there is no overall increase in impervious surfaces as part of a development, regardless of the area.</p>
S225 Upper Hutt City Council	S225.100	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Allow		



Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.065	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow	Delete	As for Rule WH.R5 and WHR6 above  f not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.
S161 Gillies Group Management Ltd	S161.021	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow		
S169 Koru Homes NZ Ltd	S169.016	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow		
S173 Arakura Plains Development Limited	S173.021	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow		
S225 Upper Hutt City Council	S225.102	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces -	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S226 Higgins Contractors Limited	S226.015	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Allow		
S38 Summerset Group Holdings Limited	S38.016	Rule WH.R12: All other stormwater discharges - non-complying activity.	Allow	Delete	As for Rule WH.R5, WH.R6 WH.R11 above.  Discretionary activity status is more appropriate than non-complying activity status
S169 Koru Homes NZ Ltd	S169.017	Rule WH.R12: All other stormwater discharges - non-complying activity.	Allow	f not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	
S217 R P Mansell; A J Mansell, & M R Mansell	S217.010	Rule WH.R12: All other stormwater discharges - non-complying activity.	Allow		
S243 Land Matters Limited	S243.023	Rule WH.R12: All other stormwater discharges - non-complying activity.	Allow		
S33 Wellington City Council	S33.067	Rule WH.R13: Stormwater from new unplanned greenfield development -	Allow	Delete and amend so that Stormwater from new unplanned greenfield development is a Discretionary Activity status is more appropriate.	The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and n particular Policy 8 and as such could prevent territorial authorities from meeting its ongoing requirements under the NPS-UD.  This provision is likely to lead to unintended consequences.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		prohibited activity.			Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.
S38 Summerset Group Holdings Limited	S38.017	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		<p>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</p> <p>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</p> <p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore the prohibited activity status inappropriate.</p>
S219 Cuttriss Consultants Ltd	S219.019	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		<p>The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility due to not implementing the higher order documents, and any section 32 analysis would be at risk of identifying development as being contrary to objectives and policies in these plans.</p>
S220 Rosco Ice Cream Ltd	S220.016	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		<p>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</p>
S225 Upper Hutt City Council	S225.104	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S236 Parkvale Road Limited	S236.010	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S239 Orogen Limited	S239.008	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S241 Pukerua Property Group Ltd	S241.019	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S243 Land Matters Limited	S243.030	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.019	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S256 Waste Management NZ Limited	S256.012	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S257 Kāinga Ora	S257.033	Rule WH.R13: Stormwater from new unplanned greenfield development - prohibited activity.	Allow		
S33 Wellington City Council	S33.071	Rule WH.R23: Earthworks - permitted activity.	Allow	Amend to take into consideration these submissions including removal of the (iv) and the requirements that there no "no discharge of sediment from earthworks."	Subclause (g) cannot be meet as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subcaluse (h).
S38 Summerset Group Holdings Limited Trading Limited	S38.018	Rule WH.R23: Earthworks - permitted activity.	Allow	Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS ion any stormwater discharge.	As Orogen Notes, the technical reports for PC1, reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at ower rates, even when the earthworks area is stabilised.
S239 Orogen Limited	S239.009	Rule WH.R23: Earthworks - permitted	Allow	50g/m3 to Schedule A sites	AS currently written no earthworks will meet the permitted activity criteria, regardless of size and treatment.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		activity.		and 100g/m <sup>3</sup> to any other water body are noted in WH.R3 (notes these levels may need to be amended following submission by experts in this field).	
S161 G Gillies Group Management Ltd	S161.025	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow	Remove (b) from WH.R24 and delete WH.R25 so that earthworks are not a non-complying activity.	<p>Whilst there is greater potential for earthworks to have negative adverse effects during the winter period between 1 June and 30 September it does not automatically follow that all earthworks underway during this period will have negative effects.</p> <p>Each job should be treated on its merits and conditioned accordingly, and one of the matters for discretion is the "timing of the works".</p> <p>The matter for discretion, "The proportion of unestablished land in the catchment.", is vague and gives an applicant no idea what % of disturbance is likely to be acceptable per catchment and makes the applicant reliant upon the actions of others.</p> <p>If the % limit for a catchment is exceeded because there are multiple developments in the area, how does Council decide who goes first? This could cause a trade competition issue.</p> <p>The current method of site-specific assessments during winter works in achieving the objectives of the NPS-FW. A blanket non-complying activity status does not take into account the scale, nature or duration of works.</p> <p>Shutting down all work during this period would significantly increase the costs and is impractical for large projects including large infrastructure projects that take years to complete.</p>
S211 Hutt City Council	S211.024	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow		
S219 Cuttriss Consultants Ltd	S219.020	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow		
S239 Orogen Limited	S239.011	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow		
S247 Carrus Corporation Ltd	S247.020	Rule WH.R24: Earthworks - restricted discretionary activity.	Allow		

## Te Awarua-o-Porirua

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.021	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Allow	Amend policy so that greenfield developments are not prohibited.	<p>The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent territorial authorities from meeting its ongoing requirements under the NPS-UD.</p> <p>This provision is likely to lead to unintended consequences.</p> <p>Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.</p> <p>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</p> <p>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</p> <p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore the prohibited activity status inappropriate.</p> <p>The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility as they are likely to be found to be on conflict with the higher order documents.</p> <p>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</p>
S38 Summerset Group Holdings Limited	S38.022	Policy P.P13: Stormwater discharges from new and redeveloped	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words	<p>The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.</p> <p>Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		impervious surfaces.		"from new greenfield developments" and lowering all treatment targets.	The proposed regional plan rule framework duplicates consenting requirements. GWRC should focus on higher-level management of discharge consents.
S151 Wellington Water Ltd	S151.117	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Allow		Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region.
S240 Porirua City Council	S240.044	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	Allow		The practicalities of complying with this Policy needed to be thoroughly assessed before PC1 was releases, including via consultation with affected parties. There will be instances where it is not practicable to achieve hydrological controls due to topographical, geotechnical and other constraints.  Ready made 'acceptable solutions' should have been developed and included in PC1.
S33 Wellington City Council	S33.097	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow	Delete policy as notified, or significantly modify to address the concerns raised in these submissions, including removing the words "from new greenfield developments" and lowering all treatment targets.	The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.  Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.
S38 Summerset Group Holdings Limited	S38.023	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.  The proposed financial contribution will decrease housing affordability.
S161 Gillies Group Management Ltd	S161.028	Policy P.P14: Stormwater contaminant offsetting for new greenfield development	Allow		A mandatory flat fee financial contribution may incentivise large lots over intensification.



Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S165 Pukerua Holdings Ltd	S165.028	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S169 Koru Homes NZ Ltd	S169.023	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S173 Arakura Plains Development Limited	S173.028	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S243 Land Matters Limited	S243.017	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S254 Best Farm Ltd	S254.008	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	Allow		
S33 Wellington City Council	S33.098	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow	Delete policy.	<p>No greenfield development is every 'unplanned' as they have to go through a TA plan change and/or resource consent process. As a result, this terminology is inappropriate.</p> <p>As there is no way to entirely "avoid" all new stormwater discharges this policy could never be complied with. In effect a prohibition of greenfield development. Such an approach is not necessary to achieve the objectives and policies of the NPS-FM 2020 and is contrary to the NPS-UD.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.024	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		This policy conflicts with the intended outcomes of the NPS-UD to provide for well-functioning urban environments, including both through infill, and greenfield developments. Policy 6 requires planning decisions that affect urban environments to consider the benefits of urban development and the contributions that development makes to provide or realise development capacity, and this has not been sufficiently considered in PC1 as economic impacts have not been assessed.
S169 Koru Homes NZ Ltd	S169.024	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		This provision is likely to lead to unintended consequences.  The policy will negatively affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.
S173 Arakura Plains Development Ltd	S173.029	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility due to not implementing the higher order documents, and any section 32 analysis would be at risk of identifying development as being contrary to objectives and policies in these plans.  GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.
S240 Porirua City Council	S240.046	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		
S243 Land Matters Limited	S243.018	Policy P.P15: Stormwater discharges from new unplanned greenfield development	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S251 Peka Peka Farm Limited	S251.012	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		
S254 Best Farm Ltd	S254.009	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	Allow		
S38 Summerset Group Holdings Limited	S38.025	Policy P.P29: Winter shut down of earthworks.	Allow	Delete policy and make earthworks greater than 3,000m <sup>2</sup> between 1 June and 30 September a Discretionary Activity.	This policy is written in the form of a or standard rather than outlining how an objective will be implemented. The current method of site- specific assessments during winter works in achieving the objectives of the NPS-FW.
S169 Koru Homes NZ Ltd	S169.025	Policy P.P29: Winter shut down of earthworks.	Allow		Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.
S173 Arakura Plains Development Ltd	S173.030	Policy P.P29: Winter shut down of earthworks.	Allow		
S177 Transpower New Zealand Limited	S177.053	Policy P.P29: Winter shut down of earthworks.	Allow		
S206 Winstone Aggregates	S206.076	Policy P.P29: Winter shut down of earthworks.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S217 R P Mansell; A J Mansell, & M R Mansell	S217.023	Policy P.P29: Winter shut down of earthworks.	Allow		
S219 Cuttriss Consultants Ltd	S219.025	Policy P.P29: Winter shut down of earthworks.	Allow		
S254 Best Farm Ltd	S254.011	Policy P.P29: Winter shut down of earthworks.	Allow		
S257 Kāinga Ora	S257.054	Policy P.P29: Winter shut down of earthworks.	Allow		
S274 Goodman Contractors Limited	S274.003	Policy P.P29: Winter shut down of earthworks.	Allow		
S275 The New Zealand Transport Agency	S275.035	Policy P.P29: Winter shut down of earthworks.	Allow		
S275 The New Zealand Transport Agency	S275.036	Policy P.P29: Winter shut down of earthworks.	Allow		
S275 The New Zealand Transport Agency	S275.040	Policy P.P29: Winter shut down of earthworks.	Allow		
S285 Civil Contractors New Zealand	S285.031	Policy P.P29: Winter shut down of earthworks.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.110	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow	Delete  If not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	PC1 Rule P.R5 would require all brownfield developments to seek consent for stormwater discharges from both District and Regional Councils, which is an unnecessary duplication.  The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.  Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.
S38 Summerset Group Holdings Limited	S38.028	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.  (a) Should be deleted as it discourages development of large brownfield sites. This is something which should be encouraged. Especially as GW is effectively preventing any future greenfield development.  (b) Should be deleted as the material used are controlled by TAs. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.  (c) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.
S151 Wellington Water Ltd	S151.125	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		(c)(i) Is somewhat ironic. Why is it necessary to implement hydrological controls for greenfield development. when PC1 effectively bans them.  (c)(ii) applies equally to existing and new impervious surfaces >30m <sup>2</sup> . So, in effect any redevelopment (eg relaying a section of a drive) or new work 9insalling a carpad) >30m <sup>2</sup> would require a GW consent.  Clause (c) is too vague as it does not specify what the hydrological controls have to achieve
S161 Gillies Group Management Ltd	S161.033	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S169 Koru Homes NZ Ltd	S169.028	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of impervious areas of 31m <sup>2</sup> .  The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices.
S173 Arakura Plains Development Ltd	S173.033	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects, and may impact upon their viability. This was not considered in the s32 analysis.
S209 Enviro NZ Services Ltd (Enviro NZ)	S209.047	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S219 Cuttriss Consultants Ltd	S219.028	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S247 Carrus Corporation Ltd	S247.028	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S254 Best Farm Ltd	S254.012	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S257 Kāinga Ora	S257.056	Rule P.R5: Stormwater from new and redeveloped impervious surfaces - permitted activity.	Allow		
S33 Wellington City Council	S33.111	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow	Delete  If not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority stormwater networks.	P.R6 is somewhat ironic. Why is it necessarily have a controlled rule for new greenfield impervious surfaces when PC1 effectively bans them?  The proposed framework does not promote integrated management and will result in consenting overlap without evidence of improved resource management outcomes.  Stormwater discharges are already managed via a global stormwater discharge consent, and TAs manage land use and therefore stormwater discharges via the land use consent process.
S38 Summerset Group Holdings Limited	S38.029	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled	Allow		Requiring two consents for the same thing from two different consent authorities is unnecessary and inefficient and will lead to increased costs for all.  (a) Should be deleted as it discourages development of large brownfield sites. This is

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		activity.			something which should be encouraged. Especially as GW is effectively preventing any future greenfield development.
S161 Gillies Group Management Ltd	S161.034	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		(b) Any new or replaced hard surface area >30m <sup>2</sup> is unable to comply with P.R5.(c)(ii). As a result P.R6(b) requires a controlled activity consent for all new or replacement impervious surfaces between 30m <sup>2</sup> and 1,000m <sup>2</sup> .
S165 Pukerua Holdings Ltd	S165.034	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		(c) Requiring Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only require mitigation where residual adverse effects that are more than minor.
S169 Koru Homes NZ Ltd	S169.029	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		(d) Territorial authorities are responsible for the discharged from their networks. A policy in the NRP would be sufficient as TAs will have to incorporate appropriate rules into their District Plans to meet that policy.
S173 Arakura Plains Development Ltd	S173.034	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		(e) Review 85% treatment requirement based on complete economic analysis including impacts on housing and business land supply throughout the region.  The practicalities of complying with this Policy needed to be thoroughly assessed before PC1 was releases, including via consultation with affected parties. There will be instances where it is not practicable to achieve hydrological controls due to topographical, geotechnical and other constraints.  Ready made 'acceptable solutions' should have been developed and included in PC1.
S243 Land Matters Limited	S243.025	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		s too vague as it does not specify what the hydrological controls have to achieve and there is insufficient detail on the types of hydrological controls required for various types and scales of development. Engineering advice should not be necessary for the creation of impervious areas of 31m <sup>2</sup> .  The new requirements are inconsistent with provisions relating to housing affordability in the NPS-UD, and their costs are not addressed in the s32 report. These changes are likely to add considerably to the cost of developing and as a result will add to housing prices.  Bring the PC1 rules in with immediate effect will result in the need to redesign numerous pre-committed projects, and may impact upon their viability. This was not considered in the s32 analysis.  Hydrological controls should not be required if there is no overall increase in impervious surfaces as part of a development, regardless of the area.



Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S254 Best Farm Ltd	S254.013	Rule P.R6: Stormwater from new greenfield impervious surfaces - controlled activity.	Allow		
S33 Wellington City Council	S33.112	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Allow		
S38 Summerset Group Holdings Limited	S38.030	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Allow		
S161 Gillies Group Management Ltd	S161.035	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas- controlled activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S243 Land Matters Limited	S243.026	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Allow		
S247 Carrus Corporation Ltd	S247.030	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Allow		
S254 Best Farm Ltd	S254.014	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas-controlled activity.	Allow		
S33 Wellington City Council	S33.115	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary	Allow	Delete  If not deleted significantly amend to limit the applicability of the rule to development that is not connected to local authority	As for Rule P.R5 – PR7 above

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
		activity.		stormwater networks.	
S161 Gillies Group Management Ltd	S161.036	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Allow		
S169 K Koru Homes NZ Ltd	S169.031	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Allow		
S243 Land Matters Limited	S243.027	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Allow		
S254 Best Farm Ltd	S254.015	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Allow		
S38 Summerset Group Holdings Limited	S38.031	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow	Delete  If not deleted significantly amend to limit the applicability of the rule to	As for Rules P.R5 – PR10 above.  Discretionary activity status is more appropriate than non-complying activity status

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S161 Gillies Group Management Ltd	S161.037	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow	development that is not connected to local authority stormwater networks.	
S165 Pukerua Holdings Ltd	S165.037	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S169 Koru Homes NZ Ltd	S169.032	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S173 Arakura Plains Development Ltd	S173.037	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S243 Land Matters Limited	S243.028	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S257 Kāinga Ora	S257.060	Rule P.R11: All other stormwater discharges - non-complying activity.	Allow		
S33 Wellington City Council	S33.117	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow	Delete rules and make discharges from greenfield developments a Discretionary Activity	<p>The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent territorial authorities from meeting its ongoing requirements under the NPS-UD.</p> <p>This provision is likely to lead to unintended consequences.</p> <p>Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.</p>

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Somerset Group Holdings Limited	S38.032	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		<p>The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.</p> <p>The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.</p> <p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions, therefore the prohibited activity status inappropriate.</p>
S161 Gillies Group Management Ltd	S161.038	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		<p>The requirement for two plan changes to enable greenfield development on the basis that it will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could jeopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan changes an impossibility as they are likely to be found to be contrary to objectives and policies in these plans.</p>
S239 Orogen Limited	S239.016	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		<p>GWRC should be considering each development individually, based on the merits and the impacts it has on the environment and any mitigation propose.</p>
S240 Porirua City Council	S240.070	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S243 Land Matters Limited	S243.029	Rule P.R12 - Stormwater discharges from new unplanned greenfield development - prohibited activity.	Allow		
S161 Gillies Group Management Ltd	S161.039	Rule P.R22: Earthworks - permitted activity.	Allow	Amend to take into consideration these submissions including removal of the (iv) and the requirements that there no "no discharge of sediment from earthworks."	Subclause (g) cannot be meet as you cannot guarantee that no sediment will leave the site or enter a waterbody, and that sediment is already managed by subcaluse (h).  As Orogen Notes, the technical reports for PC1, reference studies specifying that the sediment removal of all devices are less than 100% and sediment discharges continue to occur, albeit at ower rates, even when the earthworks area is stabilised.
S254 Best Farm Ltd	S254.019	Rule P.R22: Earthworks - permitted activity.	Allow	Amend Items (c)(1v) and (c)(v) so that they allow an appropriate level of SS in any stormwater discharge	No earthworks will meet the permitted activity criteria, regardless of size and treatment.
S257 Kāinga Ora	S257.064	Rule P.R22: Earthworks - permitted activity.	Allow		
S38 Summerset Group Holdings Limited	S38.034	Rule P.R23: Earthworks - restricted discretionary activity.	Allow	Remove (b) from P.R23 and delete WH.R24 so that earthworks are a Discretionary Activity.	Whilst there is greater potential for earthworks to have negative adverse effects during the winter period between 1 June and 30 September it does not automatically follow that all earthworks underway during this period will have negative effects.  Each job should be treated on its merits and conditioned accordingly, and one of the matters for discretion is the "timing of the works".
S161 Gillies Group Management Ltd	S161.040	Rule P.R23: Earthworks - restricted discretionary activity.	Allow		The matter for discretion, "The proportion of unestablished land in the catchment.", is vague and gives an applicant no idea what % of disturbance is likely to be acceptable per catchment and makes the applicant reliant upon the actions of others.
S219 Cuttriss Consultants Ltd	S219.031	Rule P.R23: Earthworks - restricted discretionary activity.	Allow		f the % limit for a catchment is exceeded because there are multiple developments in the area, how does Council decide who goes first? This could cause a trade competition issue.  The current method of site- specific assessments during winter works in achieving the

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S239 Orogen Limited	S239.017	Rule P.R23: Earthworks - restricted discretionary activity.	Allow		objectives of the NPS-FW. A blanket non-complying activity status does not consider the scale, nature or duration of works.  Shutting down all work during this period would significantly increase the costs and is impractical for large of projects including large infrastructure projects that take years to complete.
S254 Best Farm Ltd	S254.020	Rule P.R23: Earthworks - restricted discretionary activity.	Allow		

## Schedules

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S33 Wellington City Council	S33.138	Schedule 30: Financial Contributions	Allow	Delete Schedule 30.	For the reasons given under other parts of submission, there should not be financial contributions on stormwater discharges. Including:  TAs already collect financial contribution towards stormwater upgrades. GW requiring them is an unnecessary duplication.
S165 PUKERUA HOLDINGS LIMITED	S165.041	Schedule 30: Financial Contributions.	Allow		PC1 will have significant consequences for affordability of housing and land development in Wellington Region. The significant financial contribution for new residential units will have flow on housing affordability effects in the region and is inconsistent with Objective 2 and associated policies of NPS-UD. This has not been considered in the Section 32 report which ignores the housing affordability implications of the proposed changes.
S169 Koru Homes NZ Ltd	S169.036	Schedule 30: Financial Contributions.	Allow		A mandatory flat fee financial contribution may incentivise large lots over intensification.
S173 Arakura Plains Development Ltd	S173.041	Schedule 30: Financial Contributions.	Allow		The requirement for financial contributions and risk cost introduced through additional consenting will have flow on effects to the cost of housing in the region and is inconsistent with Objective 2 and associated policies of NPS-UD.
S220 Rosco Ice Cream Ltd	S220.019	Schedule 30: Financial Contributions.	Allow		
S236 Parkvale Road Limited	S236.011	Schedule 30: Financial Contributions.	Allow		Financial contributions to offset all residual adverse effects regardless of scale is inconsistent with the RMA and NPS-FM, which only requires mitigation of residual adverse effects that are more than minor.

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S241 Pukerua Property Group Ltd	S241.038	Schedule 30: Financial Contributions.	Allow		t is not clear what the financial contributions will be used for.
S243 Land Matters Limited	S243.032	Schedule 30: Financial Contributions.	Allow		t unreasonable to collect these contributions tax prior to consent being given effect to. This may make some developments non-viable exacerbating the current housing availability and affordability issues.
S247 Carrus Corporation Ltd	S247.032	Schedule 30: Financial Contributions.	Allow		The schedule also requires the tax be based on the number of EHU's expected to be delivered. This is impossible to predict if the application relates simply to earthworks.
S254 Best Farm Ltd	S254.021	Schedule 30: Financial Contributions.	Allow		Who will be charged with calculating this, what is the dispute resolution process and what happens if any future development delivers less than what was calculated?

## Maps

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S38 Summerset Group Holdings Limited	S38.035	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow	Delete maps 86 – 89 and all references to unplanned greenfield areas/development from PC1.	The use of the prohibited activity rule is a blunt instrument which conflicts with the NPS-UD and in particular Policy 8 and as such could prevent territorial authorities from meeting their ongoing requirements under the NPS-UD.  This provision is likely to lead to unintended consequences.
S161 Gillies Group Management Ltd	S161.042	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		Prohibited activity status will affect the ability of territorial authorities to make strategic decisions on growth and create difficulties with minor changes to urban zoning.  The prohibited status has not been reasonably justified, and that alternatives that could achieve the strategic intent of the rule without requiring a dual plan change process.
S165 Pukerua Holdings Ltd	S165.042	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		The prohibited status removes a consenting pathway for proposals that may have positive outcomes for the community and for freshwater.



Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S169 Koru Homes NZ Ltd	S169.037	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		<p>The s32 evaluation suggest that contaminants can be addressed through a combination of treatment and financial contributions. As a result the prohibited activity status inappropriate.</p> <p>The requirement for two plan changes to enable greenfield development will create challenges for the private sector's responsiveness to the housing needs, is onerous and costly, and could eopardise the economic viability of development and supply of affordable housing.</p> <p>The prohibition laden objective and policy framework (both in NRP and RPS) would render future plan change an impossibility as there would be at risk of the proposal being identifying as being contrary to objectives and policies in the higher level planning documents.</p> <p>GWRC should be considering each development individually, based on the merits and the mpacts it has on the environment and any mitigation propose</p>
S173 Arakura Plains Development Ltd	S173.042	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		
S251 Peka Peka Farm Limited	S251.016	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		
S257 Kāinga Ora	S257.068	Map 86: Unplanned greenfield areas - Porirua City Council.	Allow		
S38 Summerset Group Holdings Limited	S38.036	Map 87: Unplanned greenfield areas - Wellington City Council.	Allow		
S161 Gillies Group Management Ltd	S161.043	Map 87: Unplanned greenfield areas - Wellington City Council.	Allow		
S165 Pukerua Holdings Ltd	S165.043	Map 87: Unplanned greenfield areas - Wellington City	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S169 Koru Homes NZ Ltd	S169.038	Council. Map 87: Unplanned greenfield areas - Wellington City Council.	Allow		
S236 Parkvale Road Limited	S236.012	Map 87: Unplanned greenfield areas - Wellington City Council.	Allow		
S38 Summerset Group Holdings Limited	S38.037	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S161 Gillies Group Management Ltd	S161.044	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S165 Pukerua Holdings Ltd	S165.044	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S169 Koru Homes NZ Ltd	S169.039	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		

Submitter	Submission Point	Provision	Stance on submission point	Decision Sought	Reasons
S173 Arakura Plains Development Ltd	S173.044	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S251 Peka Peka Farm Limited	S251.018	Map 88: Unplanned greenfield areas - Upper Hutt City Council.	Allow		
S33 Wellington City Council	S33.151	Map 89: Unplanned greenfield areas - Hutt City Council.	Allow		
S38 Summerset Group Holdings Limited	S38.038	Map 89: Unplanned greenfield areas - Hutt City Council.	Allow		
S161 Gillies Group Management Ltd	S161.045	Map 89: Unplanned greenfield areas - Hutt City Council.	Allow		