

# Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Addendum 2 to Summary of Decisions Requested



## Table 1: Submission points amended in the Summary of Decisions Requested:

Corrections to the Summary of Decisions Requested are recorded in red text below and should be read in conjunction with the [Summary of Decisions requested \(by Provision\)](#), or [Summary of Decisions requested \(by Submitter\)](#) which was notified on Monday 12 February 2024.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
<b>S151 - Wellington Water Ltd</b>					
S151.184	General comments	General comments - wastewater	Amend	Concerned the PC1 policies and rules are not sufficiently enabling, and in some instances are not feasible to implement.	<p>Amend policies and rules to:                      Cleanly 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 non-complying activity rules in other parts of the NRP.</p> <p>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).</p> <p>Allow matters of detail to be specified in sub-catchment SMPs and SIPs, rather than in the initial SMS and WNCIS.</p> <p>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).</p> <p>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).</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.
S151.185	General comments	General comments - wastewater	Amend	<p>Supports a restricted discretionary activity status and the preclusion of public notification for stormwater and wastewater discharges from the local authority networks. However, concerned with the current drafting of the rules which may undermine the Restricted Discretionary status and create uncertainty due to a pre-requisite or 'condition' requiring the activity be accompanied by a strategy prepared 'in accordance with' (as relevant) Schedules 31 or 32. Considers this framing and the subjective wording could invite debate as to whether the relevant strategy is 'in accordance' with them and whether Restricted Discretionary status applies. Also considers this approach is too uncertain for the activity status, and duplicates the substantive assessment of the applications</p> <p>Notes there are further rules in the NRP that should not apply to discharges (e.g. R93 and R120) from the local authority networks and that operative rules such as those relating to sites of significance and wetlands, and the National Environmental Standard for Freshwater, would continue to apply to any stormwater or wastewater discharge from the network.</p> <p>Considers these other less specific rules would undermine the restricted discretionary activity status proposed in PC1 for network discharges.</p> <p>Considers this cannot have been intended, noting the effects on sites of significance being included within the matters of discretion under the new restricted discretionary rules suggests this.</p>	<p>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</p> <p>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.</p> <p>Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>
S151.186	General comments	General comments - wastewater	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.</p> <p>Considers PC1 will require Wellington Water to</p>	<p>PC1 be amended to remove unnecessary modelling requirements which are currently to be undertaken by the consent holder;</p> <p>Greater Wellington be responsible for all state of the environment modelling; and</p> <p>Reference to modelling 'concentrations' are removed.</p> <p>Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>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'.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Notes Wellington Water is also not able to model E. coli or enterococci concentrations or load, and instead must use the wet weather discharge frequency as a proxy for this.</p>	
S151.187	General comments	General comments - wastewater	Amend	Supports a partnership between Greater Wellington and consent holders for monitoring stormwater and wastewater discharge effects but considers more definition is required about was each party is	Amend PC1 to: -Clearly indicate what monitoring consent holders are responsible for; and -Clarify that Greater Wellington is responsible for all state of the environment monitoring.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>responsible for.</p> <p>Submitter is implementing a monitoring plan under their Stage 1 Global Stormwater consent to develop a baseline of information on effects of discharges from the network on receiving environments. The monitoring plan will then be revised to provide an integrated receiving environment approach for the network discharges. It is expected that any broader state of the environment monitoring will be undertaken by GWRC and this is the most appropriate approach to monitoring which should be reflected in PC1.</p> <p>Concerned that the PC1 provisions may envisage or require more monitoring to inform the wastewater and stormwater modelling than is actually necessary (or may be necessary in future).</p>	<p>Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>
S151.188	General comments	General comments - wastewater	Amend	<p>Considers provisions in PC1 to manage contaminants discharged to groundwater are inconsistent and unclear and place too much focus on stormwater. For example:</p> <ul style="list-style-type: none"> <li>-Policy WH.P7 discharges to groundwater is a holistic policy, however it is not carried through to all relevant activities.</li> <li>-Rule R48 Stormwater from individual property - does not mention any effects on groundwater.</li> <li>-Rule WH.R3 Stormwater from individual property - does not mention any effects on groundwater.</li> <li>-Rule WH.R4 Stormwater from existing high risk premise - limits the effects on groundwater to potable water or stock water.</li> <li>-Rule R51 Stormwater to land permitted - limits the effects on groundwater to potable water or stock water.</li> <li>-Rule WH.R2 Stormwater to land - limits the effects on groundwater to potable water or stock water.</li> <li>-s5.1.13 general conditions - there is no mention of discharge to groundwater.</li> <li>-Policy P73 Farm plans - no mention of minimising contamination of groundwater even though farming is a known major contributor in many areas of Aotearoa New Zealand.</li> </ul>	<p>Seeks greater clarity of the approach to managing groundwater, including increased focus on recognised and accepted effects from activities, rather than just activities.</p> <p>Alternatively, discharges of contaminants from the stormwater and wastewater network (other than from a Wastewater Treatment Plant (WWTP)) should be managed by capping, minimising and reducing loads so they do not increase over time and where TAS are exceeded, the reduction is to the extent reasonably practicable.</p> <p>Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>-Rule R54 Stormwater from ports - does not include discharge to groundwater.</p> <p>-Schedule 31 - Local authorities need to address effects on groundwater as part of the SMS. Policy WH.P21 and P22 refer to "capping, minimising and reducing", not increasing over time and where TAS are exceeded reductions are "to the extent reasonably practicable". This is very different to the expectations for stormwater and wastewater from local authority networks</p>	
<b>S177 - Transpower New Zealand Limited</b>					
S177.013	2 Interpretation	Redevelopment	Amend	<p>Seeks reference to redevelopment of existing urbanised property is removed from chapeau, as the definition also applies to rules that are not exclusively limited to redevelopment of urbanised property (see for example rule WH.R11). Considers reference to "addition (new)" should be replaced with "addition of new" to improve clarity of provision.</p> <p>Seeks reference to "minor" be removed as it adds uncertainty to definition scope. Considers activity status for redevelopment of impervious surfaces associated with National Grid assets is overly onerous in context of policy 2 and policy 5 of NPSET. Considers that to give effect to policy 2 and policy 5 of the NPSET, as well as policies 13 and 14 in the NRP it is appropriate to exclude redevelopment of existing impervious surfaces for the purposes of operating, maintaining, or upgrading the National Grid from the definition.</p>	<p>Amend as follows:</p> <p>Redevelopment  <del>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.)</del> in relation to stormwater effects, this <del>includes</del> is the replacement, reconstruction, or addition (<del>new</del>) of <b>new</b> impervious surfaces. Excludes:</p> <ul style="list-style-type: none"> <li><del>minor</del> maintenance or repairs to roads, carparking areas, driveways and paving</li> <li>installation, maintenance or repair of underground infrastructure or network utilities requiring trenching and resurfacing</li> </ul> <p><b>redevelopment of existing impervious surfaces for the purposes of operating, maintaining, or upgrading the National Grid</b> activities that only involve the re-roofing of existing buildings.</p>
S177.017	5.4 Beds of lakes and rivers	Rule R128: New structures - permitted activity.	Amend	<p>Considers removal of reference to "structure" from chapeau significantly reduces range of structures permitted and it is unclear whether National Grid transmission lines traversing rivers or lakes will be permitted under rule. Considers reference to "cable" in rule is not sufficient to provide for National Grid, as National Grid cables are generally transmission lines located below ground (not those lines above ground). Seeks either the reference to "new structure" in chapeau is retained, or specific reference to National Grid transmission lines is provided for in rule,</p>	<p>Reinstating the words "structure, including" to the chapeau of the rule.</p> <p>Alternatively, amend the rule as follows:</p> <p>Rule R128: New structures - permitted activity</p> <p>The placement of a <del>new structure, including</del> sediment retention weirs, pipelines (such as a natural gas pipeline), ducts, cables, <b>National Grid transmission line</b>, hydrological and water quality monitoring equipment, fences, <del>erosion protection structures</del>, debris arrestor structures or a <del>and</del> structures associated with <b>vegetative bank edge protection</b> <del>except a</del></p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>wherever the term "cable" is mentioned. Alternatively, considers matter would be addressed by reinstating words "structure, including" to chapeau of rule. Notes minor error in chapeau, where "structure associated with vegetative bank edge protection" should be amended to refer to structure in singular (rather than plural).</p>	<p><del>structure permitted by Rules R125, R126 and R127 and passive flap-gates, that is fixed in, on, under, or over the bed of any river or lake, excluding activities regulated by the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017 except general condition 5.4.4(n);</del> including any associated:</p> <ul style="list-style-type: none"> <li>(a) disturbance of the river or lake bed, and</li> <li>(b) deposition on the river or lake bed, and</li> <li>(c) diversion of water, and (d) discharge of sediment to water, and</li> <li>(e) temporary damming of water,</li> </ul> <p>excluding activities regulated by the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017 except when general condition 5.4.4(n) applies,</p> <p>is a permitted activity, provided the following conditions are met:</p> <ul style="list-style-type: none"> <li>(f) the activity shall comply with the beds of lakes and rivers general conditions specified above in Section 5.4.4, and</li> <li>(g) the activity does not occur within a site identified in Schedule C (mana whenua), excluding adding pipelines, <del>or</del> cables, <b>or National Grid transmission lines</b> to an existing structure or providing for fish refuge, and</li> <li>(h) the activity does not occur in or on any part of the river bed identified as inanga spawning habitat in Schedule F1 (rivers/lakes), and</li> <li>(i) the structure does not occupy a bed area any greater than 10m<sup>2</sup>, except for where the structure is associated with vegetative bank edge protection, or a pipeline, duct, fence, <del>or</del> cable, <b>or National Grid transmission line</b> which is located over or under the bed where no bed occupancy limits apply, and</li> <li>(j) the catchment upstream of any sediment retention weir is not greater than 200ha, and</li> <li>(k) the height of any sediment retention weir from the upstream base to the crest of the weir at the time of construction shall be no more than 0.5m, and</li> <li>(l) the placement of a weir other than a customary weir, in, on over or under the bed of any river or connected area must also comply with the following: (i) the fall height of the weir must be no more than 0.5m, and</li> <li>(ii) the slope of the weir must be no steeper than 1:30, and</li> <li>(iii) the face of the weir must have roughness elements that are mixed grade rocks of 150 to 200mm diameter and irregularly spaced no more than 90mm apart to create a hydraulically diverse flow structure across the weir (including any wetted margins), and</li> <li>(iv) the weir's lateral profile must be V-shaped, sloping up at the banks, and with a low-flow channel in the centre, with the lateral cross-section slope between 5° and 10°, and</li> </ul>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					(m) for all new weirs (except customary weirs), non-passive flap gates, aprons and ramps, placed in rivers or connected areas, the information requirements of Regulations 62, 64, 65, and 68 as relevant for the structure, of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 shall be provided as set out in the regulations. <b>Note</b> <del>The placement of a passive flap gate in, on, over or under the bed of any river or connected area is a non-complying activity regulated by the Resource Management (National Environmental Standards for Freshwater) Regulations 2020.</del>
S177.021	8 Whaitua Te Whanganui-a-Tara	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	Amend	<p>Considers it impracticable to avoid contaminants being entrained in stormwater and notes this is acknowledged in section 32 report and by policies such as WH.P15.</p> <p>Focus of the policy is on management of hazardous substances prepared, used or stored at high risk industrial and trade premises, so reference to contaminants generally should be removed from the policy, in order that the policy is implementable and retains clear focus on the management of hazardous substances.</p> <p>Notes management of stormwater contaminants generally is provided for under policies WH.P10 and WH.P14, which will also apply to high risk industrial or trade premises.</p>	<p>Amend policy as follows:</p> <p>Policy WH.P11: Discharges of <del>contaminants</del> <b>hazardous substances</b> in stormwater from high risk industrial or trade premises</p> <p>The discharge of stormwater to water, including discharges via the stormwater network, from a high risk industrial or trade premise shall be managed by:</p> <p>(a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and  (b) avoiding <del>contaminants</del> <b>or</b> 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 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</p>
S177.031	8 Whaitua Te Whanganui-a-Tara	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise -	Amend	<p>Considers limiting application of rule to existing high risk industrial or trade premises would result in new substations or switchyards for National Grid being a discretionary activity under rule WH.R11. Considers this inappropriate as it does not give effect to policy 2 of NPSET. Subject to amendments to condition (d), considers the conditions are appropriate to manage the potential adverse effects associated with stormwater discharges from existing or new high risk</p>	<p>Rule WH.R4: Stormwater from <del>an existing</del> high risk industrial or trade premise</p> <p>The discharge of stormwater from <del>an existing</del> 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:</p> <p>(a) 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</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		permitted activity.		<p>industrial or trade premises, and considers both should be provided for under same rule.</p> <p>Considers condition (d) of rule should be amended to remove reference to contaminants and retain a focus on hazardous substances. Considers the term "contaminants" is too broad and given purpose of managing high risk industrial or trade premises is to manage potential adverse effects associated with discharge hazardous substances, it is appropriate condition (d) manages only hazardous substances, rather than contaminants more broadly (which are managed under the remainder of the conditions).</p> <p>Considers note at the end of rule be deleted as part of giving effect to relief sought in this submission, as well as relief sought by submitter in relation to rules for new or redeveloped impervious surfaces.</p>	<p>(b) the discharge does not contain wastewater, and  (c) if the discharge is to land where it may enter groundwater,  (i) the discharge cannot cause or exacerbate the flooding of any other property, and  (ii) the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and  (d) any <del>contaminants stored or used on site, or</del> hazardous substances <b>stored or used on site</b>, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or  (i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or  (ii) 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 (e) 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:  (i) 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  (ii) 100g/m<sup>3</sup> where the discharge enters any other water, and where the discharge is not via an existing local authority stormwater network the discharge shall also not:  (f) cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and  (g) give rise to the following effects beyond the zone of reasonable mixing:  (i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or  (ii) any conspicuous change in the colour, or  (iii) 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 (iv) any emission of objectionable odour, or  (v) the freshwater is unsuitable for consumption by farm animals, or  (vi) any significant adverse effects on aquatic life.</p> <p><b>Note</b>  <del>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.</del></p>
S177.032	8 Whaitua Te	Rule WH.R5:	Amend	Notes rule makes new impervious surfaces at high risk industrial or trade premises a discretionary activity	Amend as follows:



Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Whanganui-a-Tara	Stormwater from new and redeveloped impervious surfaces - permitted activity.		<p>under rule WH.R11. Considers this inappropriate in context of policy 2 and policy 5 of NPSET. Considers it could lead to perverse environmental outcomes, where impervious surfaces are left to degrade as redevelopment of the surface would require a discretionary activity consent. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5.</p> <p>Considers a fixed baseline in condition (a) would be unworkable as it could result in consecutive redevelopment of same impervious surfaces being a controlled or discretionary activity, even where surface is less than 1,000m<sup>2</sup>. Concerns how compliance with fixed baseline will be monitored with respect to redevelopment (as this cannot be readily measured). Considers a 12-month time period, similar to that used for earthworks, would be more appropriate as it provides greater certainty to applicants, is more readily implementable, and is able to be effectively monitored.</p> <p>Considers Condition (c)(ii) Should be amended so hydrological control is only required for new impervious surfaces, as redevelopment of existing impervious surfaces will not change quantity of runoff from impervious surfaces.</p> <p>Seeks references to "impervious areas" (undefined) in conditions (c)(i) and (ii) be replaced with "impervious surfaces" (defined) and minor amendments made to condition (c)(ii) to improve the clarity of condition.</p>	<p>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces</p> <p>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 <del>high risk industrial or trade premise or</del> unplanned greenfield development, is a permitted activity, provided the following conditions are met:</p> <p>(a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m<sup>2</sup> (<del>baseline property existing impervious area as at 30 October 2023</del>) <b>per property in any consecutive 12-month period</b> and (b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and</p> <p>(c) 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):</p> <p>(i) for all <del>impervious areas</del> <b>impervious surfaces associated with a greenfield development, or</b></p> <p>(ii) for all <del>redeveloped and new impervious areas</del> <b>impervious surfaces involving greater than 30m<sup>2</sup> of impervious area of a redevelopment (of an existing urbanised property), and</b></p> <p>(d) 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</p> <p>(e) the discharge does not contain wastewater, and</p> <p>(f) the concentration of total suspended solids in the discharge shall not exceed:</p> <p>(i) 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</p> <p>(ii) 100g/m<sup>3</sup> where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network:</p> <p>(g) the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and</p> <p>(h) the discharge shall not give rise to the following effects beyond the zone of reasonable mixing:</p> <p>(i) the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>(ii) any conspicuous change in the colour, or            (iii) 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            (iv) any emission of objectionable odour, or            (v) the freshwater is unsuitable for consumption by farm animals, or            (vi) any significant adverse effects on aquatic life .,  <b>and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:</b>  <b>(i) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or</b>  <b>(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or</b>  <b>(ii) 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.</b></p> <p>Note            Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.<del>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.</del></p>
S177.034	8 Whaitua Te Whanganui-a-Tara	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas - controlled activity.	Amend	Notes rule makes new impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Considers this inappropriate in context of policy 2 and policy 5 of NPSET. Considers it could lead to perverse environmental outcomes, where impervious surfaces are left to degrade as redevelopment of the surface would require a discretionary activity consent. Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5.	<p>Amend rule as follows:</p> <p>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas</p> <p>The use of land for the creation of new and/or redevelopment of impervious surfaces of an 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, <del>that is not a high risk industrial or trade premise,</del> is a controlled activity, provided the following conditions are met:</p> <p>(a) the proposal involves the creation of new, or redevelopment of impervious surfaces of between 1,000m<sup>2</sup> and 3,000m<sup>2</sup> <del>(baseline property existing impervious area as at 30 October 2023)</del> <b>per property in any consecutive 12-month period</b></p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>Considers a fixed baseline in condition (a) would be unworkable as it could result in consecutive redevelopment of same impervious surfaces being a controlled or discretionary activity, even where surface is less than 1,000m<sup>2</sup>. Concerns how compliance with fixed baseline will be monitored with respect to redevelopment (as this cannot be readily measured). Considers a 12-month time period, similar to that used for earthworks, would be more appropriate as it provides greater certainty to applicants, is more readily implementable, and is able to be effectively monitored.</p>	<p>or,  (b) the proposal involves the creation of new, or redevelopment of impervious areas of less than 1,000m<sup>2</sup> but is not permitted under the conditions of Rule WH.R5,  and,  (c) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either:  (i) on-site, or  (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and  (d) contaminant treatment of stormwater is provided either: (i) on-site through a stormwater treatment system, or  (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site <b>and where the new or redeveloped impervious surface is for a high risk industrial or trade premise:</b>  <b>(e) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or</b>  <b>(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or</b>  <b>(ii) 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.</b></p> <p>Matters of control</p> <ol style="list-style-type: none"> <li>1. Whether the design and layout of the on-site stormwater treatment system incorporates best practicable option measures to achieve (to the extent practicable) the capture of 85% of the mean annual stormwater runoff and treatment in accordance with Schedule 28 (contaminant treatment)</li> <li>2. Whether the design and layout undertakes a best practicable option approach to the provision of hydrological control measures either onsite or offsite, where stormwater will enter a river</li> <li>3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilised, whether this has capacity, availability (timing) and appropriate authorisations to connect into</li> <li>4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system</li> <li>5. Whether there are topographical limitations influencing the provision of stormwater hydrological control and contaminant treatment</li> </ol>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>6. Whether sufficient use of water sensitive urban design methods have been applied to the site design and layout</p> <p><b>7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances</b></p> <p>8. Conditions to monitor compliance associated with any stormwater treatment system, <del>or</del> hydrological control measures, <b>or measures required under condition (e).</b></p> <p>Notification In respect of Rule WH.R7, applications are precluded from limited and public notification (unless special circumstances exist).</p> <p><b>Note</b> <del>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.</del></p>
S177.035	8 Whaitua Te Whanganui-a-Tara	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces - discretionary activity.	Amend	<p>Opposes default discretionary activity status for new or redeveloped impervious surfaces at high risk industrial or trade premises (including National Grid substations), for reasons set out in its submission of rules WH.R5, WH.R6 and WH.R7. Considers a reasonable level of new or redeveloped impervious surfaces should be provided for as a permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions to manage the potential adverse effects associated with hazardous substances.</p> <p>As per submission on policy WH.P15, considers it is not consistent with NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. Considers it inappropriate to require financial contributions as a condition. Where aquatic offsetting or compensation (which may include financial contributions under Schedule 30) is considered to be necessary, this can be provided for as a condition of consent with reference to requirements of policy WH.P15.</p>	<p>Amend as follows:</p> <p>Rule WH.R11: Stormwater from new and redeveloped impervious surfaces</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 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 <del>is</del> <b>are</b> met:</p> <p>(a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), <del>and</del></p> <p><del>(b) 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).</del></p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S177.036	8 Whaitua Te Whanganui-a-Tara	Rule WH.R12: All other stormwater discharges - non-complying activity.	Amend	<p>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 WH.R2, WH.R3, and WH.R4, and non-complying activity status under this rule. Minor non-compliances with conditions under these rules will trigger the non-complying activity rule.</p> <p>Non-complying activity status for minor breaches of rule conditions can be a particular issue for development or upgrading of the National Grid. Considers this leads to a high degree of uncertainty as to whether consents for development or upgrading of the National Grid will be granted under section 104D of RMA, even where minor non-compliances with stormwater conditions under rules WH.R2, WH.R3, or WH.R4 can be appropriately addressed through consent conditions. Considers this does not appropriately give effect to policy 2 of NPSET.</p> <p>Considers non-complying activity rule is not sufficiently justified in section 32 report and does not appropriately provide for activities that do not meet permitted activity conditions, but which can otherwise be managed through consent conditions as a discretionary activity. Submitter does consider that non-complying activity status should be retained for proposals that do not provide a Stormwater Impact Assessment under rule WH.R11, as this would clearly be contrary to objectives and policies of the Plan.</p>	<p>Amend rule as follows:</p> <p>Rule WH.R12: All other stormwater discharges - <del>non-complying</del> <b>discretionary</b> activity</p> <p>The:</p> <p>(a) discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or</p> <p>(b) 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</p> <p>(c) discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, <del>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 WH.R11, or</del></p> <p>(d) <del>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</del> <b>discretionary</b> activity.</p> <p><b>As a consequential amendment, provide a new non-complying activity rule for stormwater discharges that are not a discretionary activity under rule WH.R11.</b></p>
S177.042	8 Whaitua Te Whanganui-a-Tara	Rule WH.R24: Earthworks - restricted discretionary activity.	Amend	<p>Considers chapeau of rule be restructured to locate "associated discharge" element of rule to follow on from "Earthworks that do not comply with Rule WH.R23" as discharges associated with permitted earthworks are not provided for under rule WH.R23 (which only permits earthworks). Discharges from permitted earthworks are instead provided for under the "minor discharges" rule R91.</p> <p>Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it</p>	<p>Amend rule as follows:</p> <p>Rule WH.R24: Earthworks</p> <p><del>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, 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, is a</del> <b>restricted discretionary activity,</b></p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure (including the National Grid).</p> <p>Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff.</p> <p>Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy WH.P31 (and in the note to permitted activity rule WH.R23), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to matters set out under section G5.0 of guideline as a matter of discretion for earthworks.</p> <p>Considers this will ensure consistency between the rules and the Council's technical guidance for the management of earthworks, and provide for appropriate conditions to manage works over the winter period to be included in resource consents. Considers the note directing Plan users to GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021) that is included under permitted activity rule WH.R23 also be provided for under this rule.</p>	<p>provided the following conditions are met:</p> <p>(a) 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:</p> <p>(i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or</p> <p>(ii) 30% in any other river, <del>and</del></p> <p><del>(b) earthworks shall not occur between 1st June and 30th September in any year.</del></p> <p>Matters for discretion</p> <ol style="list-style-type: none"> <li>1. The location, area, scale, volume, duration and staging and timing of works</li> <li>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</li> <li>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</li> <li>4. The proportion of unstabilised land in the catchment</li> <li>5. The adequacy and efficiency of stabilisation devices for sediment control</li> <li>6. Any adverse effects on: <ul style="list-style-type: none"> <li>(i) 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)</li> <li>(ii) group drinking water supplies and community drinking water supplies</li> <li>(iii) 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</li> <li>(iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment</li> <li>(v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers</li> </ul> </li> <li>7. Duration of the consent</li> <li>8. <del>Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period.</del> <b>Where earthworks will be undertaken within the period from 1</b></li> </ol>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p><b>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 Disturbing Activities in the Wellington Region (2021)</b></p> <p>9. Monitoring and reporting requirements</p> <p><b>Note</b>  <b>Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</b></p>
S177.046	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	<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 (including the National Grid) and considers that the 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>Considers amendment to policy is necessary to ensure it is consistent with effects management hierarchy set out in NPS-FM. Aquatic offsetting is only necessary where residual adverse effects are more than minor, and resource consent applicants should be encouraged to minimise residual adverse effects so they are no more than minor (in which case aquatic offsetting is not required). Further, if aquatic offsetting is required, financial contributions as proposed by PC1 should be available as a discretionary option for achieving offsetting, but not a mandatory requirement. If applicants can provide alternative effective methods of aquatic offsetting as part of proposal in accordance with Appendix 6 of NPS-FM, then financial contributions should not be required.</p>	<p>Amend policy as follows:</p> <p>Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives</p> <p>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:</p> <p>(a) <del>prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the <b>discharge of stormwater</b> contaminants <b>from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor</b>, requiring <b>aquatic offsetting or compensation (which may include</b> financial contributions) <del>as to offset adverse effects from residual stormwater contaminants,</del> and</p> <p>(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</p> <p>(c) imposing hydrological controls on urban development and stormwater discharges to rivers, and</p> <p>(d) 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</p> <p>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</p> <p>(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</p>
S177.047	9 Te Awarua-o-Porirua	Policy P.P11: Discharges	Amend	<p>Considers it impracticable to avoid contaminants being entrained in stormwater and notes this is acknowledged in section 32 report and by policies</p>	<p>Amend policy as follows:</p> <p>Policy P.P11: Discharges of <del>a contaminant</del> <b>hazardous substances</b> in</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Whaitua	of a contaminant in stormwater from high risk industrial or trade premises.		<p>such as P.P14 which recognises potential for residual stormwater contaminants associated with development.</p> <p>Focus of the policy is on management of hazardous substances prepared, used or stored at high risk industrial and trade premises, so reference to contaminants generally should be removed from the policy, in order that the policy is implementable and retains clear focus on the management of hazardous substances.</p> <p>Management of stormwater contaminants generally is provided for under policies WH.P10 and WH.P14, which will also apply to high risk industrial or trade premises.</p>	<p>stormwater from high risk industrial or trade premises The discharge of stormwater to water from a high risk industrial or trade premise shall be managed by:</p> <p>(a) having procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, and (b) avoiding <del>contaminants or</del> 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 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.</p>
S177.059	9 Te Awarua-o-Porirua Whaitua	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	Amend	<p>Notes the rule makes new impervious surfaces at high risk industrial or trade premises a discretionary activity under rule WH.R11. Considers this inappropriate in the context of policy 2 of NPSET.</p> <p>Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activity under rules WH.R5, WH.R6 and WH.R7, subject to appropriate conditions. Considers additional conditions under (d) of rule WH.R4 are appropriate to manage potential adverse effects associated with hazardous substances and considers these be incorporated into rule WH.R5.</p> <p>As per submission on policy WH.P15, submitter considers it not consistent with the NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor. Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of NPS-FM. Considers it is inappropriate to require financial</p>	<p>Amend rule as follows:</p> <p>Rule P.R6: Stormwater from new greenfield impervious surfaces</p> <p>The use of land for the creation of new impervious surfaces for greenfield development 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 a <del>high risk industrial or trade premise or</del> unplanned greenfield development, is a controlled activity, provided the following conditions are met:</p> <p>(a) the proposal involves the creation of new impervious surfaces of between 1,000m2 and 3,000m2 (<del>baseline property existing impervious area as at 30 October 2023</del>) <b>per property in any consecutive 12-month period</b> <b>or,</b> (b) the proposal involves the creation new impervious surfaces of less than 1,000m2, but is not permitted under the conditions of Rule P.R6, and <del>(c) 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), and</del> (d) where stormwater directly or indirectly (through an existing local authority stormwater network) discharges to a river, hydrological control is provided either:</p>



Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>contributions as a condition, and instead, matter of control 6 should be amended to refer to policy WH.P15. This ensures appropriate aquatic offsetting or compensation (which may include financial contributions under Schedule 30) can be considered on a case by case basis, where required.</p> <p>Considers a fixed baseline in condition (a) would be unworkable as it could result in consecutive redevelopment of same impervious surfaces being a controlled or discretionary activity, even where surface is less than 1,000m<sup>2</sup>. Concerns how compliance with fixed baseline will be monitored with respect to redevelopment (as this cannot be readily measured). Considers a 12-month time period, similar to that used for earthworks, would be more appropriate as it provides greater certainty to applicants, is more readily implementable, and is able to be effectively monitored.</p>	<p>(i) on-site, or  (ii) off-site through an existing local authority stormwater network or privately owned stormwater network that has been sized to accommodate the proposed stormwater discharges, and  I stormwater contaminant treatment is provided that captures 85% of the mean annual runoff and directs it to a stormwater treatment system that treats in accordance with Schedule 28 (contaminant treatment) and is provided either:  (i) on-site, or  (ii) off-site through an existing local authority stormwater network or privately owned stormwater treatment system that has capacity to treat contaminant loads from the site., <b>and where the new impervious surface is for a high risk industrial or trade premise:</b>  <b>(f) any hazardous substances stored or used on site cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or</b>  <b>(i) there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or</b>  <b>(ii) 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.</b>  Matters of control  1. The design and layout of the on-site stormwater treatment system, including the ongoing operational and management measures necessary to ensure that stormwater quality will meet the requirements of condition I of this rule  2. The adequacy of hydrological control measures either on-site or off- site, where stormwater will enter a river  3. Where an off-site (or a combination of on-site and off-site) stormwater treatment system is utilized, whether this has capacity, availability (timing) and appropriate authorisations to connect into  4. The long-term operational, maintenance and ownership requirements of the stormwater treatment system  5. Whether sufficient use of water sensitive urban design measures have been applied to the site design and layout  6. <del>A financial contribution as required by Schedule 30 (financial contributions)</del>  <b>Any aquatic offsetting or compensation proposed in accordance with policy P.P14</b>  <b>7. For high risk industrial or trade premises, the adequacy of any proposed containment system, interceptor system, or other proposed methods for the management of hazardous substances</b>  8. Condition of consent to demonstrate and/or monitor compliance with conditions (d), <del>and I,</del> <b>and (f)</b> of this rule</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>Notification</p> <p>In respect of Rule P.R6, applications are precluded from limited and public notification (unless special circumstances exist).</p> <p><b>Note</b></p> <p><del>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 P.R10.</del></p>
S177.061	9 Te Awarua-o-Porirua Whaitua	Rule P.R10: Stormwater from new and redeveloped impervious surfaces-discretionary activity.	Amend	<p>Opposes default discretionary activity status for new or redeveloped impervious surfaces at high risk industrial or trade premises (including National Grid substations), for reasons set out in its submissions of rules P.R5, P.R6 and P.R7 (submission points 62-64). Considers a reasonable level of new or redeveloped impervious surfaces should be provided for as a permitted or controlled activity under rules P.R5, P.R6 and P.R7, subject to appropriate conditions to manage the potential adverse effects associated with hazardous substances.</p> <p>As per submission on policy P.P14, it is not consistent with NPS-FM to require mandatory financial contributions for purposes of aquatic offsetting, as the effects management hierarchy in NPS-FM only requires offsetting in circumstances where residual adverse effects are more than minor.</p> <p>Where residual adverse effects are more than minor, applicants should have opportunity to propose aquatic offsetting or compensation in accordance with Appendix 6 or 7 of the NPS-FM. Considers it inappropriate to require financial contributions as a condition. Where aquatic offsetting or compensation (which may include financial contributions under Schedule 30) is considered to be necessary, this can be provided for as a condition of consent with reference to requirements of policy P.P14.</p>	<p>Amend rule as follows:</p> <p>Rule P.R10: Stormwater from new and redeveloped impervious surfaces</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 via 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 <del>are</del> <b>is</b> met:</p> <p>(a) the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), <b>and</b>.</p> <p><del>(b) 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).—</del></p>
S177.065	9 Te Awarua-o-Porirua Whaitua	Rule P.R17: Vegetation clearance on highest erosion risk land -	Amend	<p>Subject to Transpower's relief being granted on rule P.R6 (providing for vegetation clearance for the purposes of operating or maintaining the National Grid as a permitted activity) submitter is neutral on rule, noting NESETA regulation 32 would apply (and prevail) where works are not permitted.</p>	<p>Amend rule as follows:</p> <p>Rule P.R17: Vegetation clearance on highest erosion risk land</p> <p>Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200 m2 per property in any consecutive 12-month period,</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		controlled activity.		<p>Considers the rehabilitation of areas of cleared vegetation (under matter of control 3) should not be undertaken in a manner or in locations where vegetation would encroach on National Grid lines or structures. Considers that an additional matter of control is necessary to address this matter.</p> <p>Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation and seeks that it be reallocated to Part 1 Schedule 1 planning instrument.</p>	<p>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.</p> <p>Matters of control</p> <ol style="list-style-type: none"> <li>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</li> <li>2. The area, location and method of vegetation clearance</li> <li>3. Stabilisation and rehabilitation of the area cleared</li> <li>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</li> <li>5. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan</li> <li>6. The time and circumstances under which the resource consent conditions may be reviewed</li> </ol> <p><b>7. The need for any rehabilitated areas of vegetation to be clear of National Grid transmission lines and support structures</b></p> <p><b>In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.</b></p>
S177.067	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Amend	<p>Notes effect of use of "and" at the end of condition (b) is to exclude all earthworks not related to implementing farm erosion risk treatment plans or farm environmental plans from the permitted activity rule. As a result, all other earthworks, regardless of size or whether they meet conditions (c) to (h) will be a restricted discretionary activity under rule P.R23. Considers this is an error and acknowledges Council have corrected this under clause 16 of Schedule 1 to the RMA by way of a memo published on 6 December 2023. Submitter has submitted on the rule as notified.</p> <p>Notes Council's proposed approach is to remove associated discharges from earthworks rule, and instead, discharges associated with earthworks are permitted under separate "minor discharges" rule (R91). Given that rule P.R22 is not a discharge rule,</p>	<p>Amend rule as follows:</p> <p>Rule P.R22: Earthworks Earthworks is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>(a) the earthworks are to implement an action in the erosion risk treatment plan for the farm, or</li> <li>(b) the earthworks are to implement an action in the farm environment plan for the farm, <del>and</del> <b>or</b></li> <li>(c) the area of earthworks does not exceed 3,000m<sup>2</sup> per property in any consecutive 12-month period, and</li> <li>(d) 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</li> <li>(e) 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</li> <li>(f) the area of earthworks must be stabilised within six months after completion</li> </ol>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>submitter considers it should not include condition (g), which is a discharge condition. Considers condition (g) inappropriate as it is not consistent with the minor discharges rule, which permits a minor discharge of suspended solids to surface water bodies or coastal water. 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.</p> <p>Opposes rule being included within freshwater planning instrument, as purpose of rule is to manage land use for purposes of soil conservation. As rule does not provide for discharges associated with earthworks, there is no justification for including it in freshwater planning instrument, seeks that it be reallocated to Part 1 Schedule 1 planning instrument.</p>	<p>of the earthworks, and  <del>(g) 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</del>  (h) erosion and sediment control measures shall be used to prevent a <b>the uncontrolled</b> discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.</p> <p>Note  Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</p> <p><b>In addition to this, reallocate the rule so that it is part of the Part 1 Schedule 1 planning instrument, and not part of the freshwater planning instrument.</b></p>
S177.068	9 Te Awarua-o-Porirua Whaitua	Rule P.R23: Earthworks - restricted discretionary activity.	Amend	<p>Considers chapeau of rule be restructured to locate "associated discharge" element of rule to follow on from "Earthworks that do not comply with Rule P.R22" as discharges associated with permitted earthworks are not provided for under rule P.R22 (which only permits earthworks). Discharges from permitted earthworks are instead provided for under the "minor discharges" rule R91.</p> <p>Considers a condition requiring earthworks be shut down over the winter months is inappropriate, as it does not recognise circumstances where earthworks need to occur over those months in order to provide for safe and efficient operation, maintenance, upgrading, or development of regionally significant infrastructure (including the National Grid).</p> <p>Recognises earthworks should be planned so majority of bulk earthworks occur outside of winter months. Considers instances where earthworks are unavoidable and with careful management can be undertaken in a manner that avoids, remedies, or mitigates adverse effects on land stability and runoff.</p>	<p>Rule P.R23: Earthworks  <del>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, 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, is a</del> restricted discretionary activity, provided the following conditions are met:</p> <p>(a) 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: (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, <del>and</del>  <del>(b) earthworks shall not occur between 1st June and 30th September in any year.</del>  Matters for discretion  1. The location, area, scale, volume, duration and staging and timing of works  2. The design and suitability of erosion of sediment control measures including</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>Notes GWRC Erosion and Sediment Control Guideline for Wellington Region (2021), which is referred to in policy P.P29 (and in the note to permitted activity rule P.R22), provides a pathway for earthworks to be undertaken during winter months subject to careful management. Considers rather than a blanket restriction on all earthworks over this period, reference is made to matters set out under section G5.0 of guideline as a matter of discretion for earthworks.</p> <p>Considers that the note directing Plan users to GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021) that is included under permitted activity rule P.R22 also be provided for under this rule.</p>	<p>consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation</p> <p>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</p> <p>4. The proportion of unstabilised land in the catchment</p> <p>5. The adequacy and efficiency of stabilisation devices for sediment control</p> <p>6. Any adverse effects on:</p> <p>(i) 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)</p> <p>(ii) group drinking water supplies and community drinking water supplies</p> <p>(iii) 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</p> <p>(iv) the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment</p> <p>(v) natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers</p> <p>7. Duration of the consent</p> <p>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period- <b>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 Disturbing Activities in the Wellington Region (2021)</b></p> <p>9. Monitoring and reporting requirements</p> <p><b>Note</b>  <b>Earthworks management guidance is available within the Greater Wellington Regional Council, Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (2021).</b></p>
S177.070	12 Schedules	Schedule 28: Stormwater Contaminant Treatment.	Amend	Considers an amendment to first sentence under heading "Target Load Reductions" is necessary to clarify that rules require stormwater discharges from impervious surfaces to be treated (as distinct from the surfaces themselves being treated).	<p>Amend schedule as follows:</p> <p>Schedule 28: Stormwater Contaminant Treatment</p> <p>This schedule relates to Rules WH.R6, WH.R7, P.R6 and P.R7</p> <p>Target Load Reductions</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested															
					<p>All <b>Stormwater discharges from</b> new and redeveloped impervious surfaces are to be treated to meet an equivalent target load reduction for copper and zinc to those set out for a raingarden/bioretention device, as per Table 1.</p> <p>Table 1: Target Load Reductions for Copper and Zinc Treatment Device</p> <table border="1"> <thead> <tr> <th>Copper</th> <th>Zinc</th> </tr> </thead> <tbody> <tr> <td>Bioretention (rain garden)</td> <td>90%</td> </tr> <tr> <td>Equivalent Target Load Reduction</td> <td>90%</td> </tr> </tbody> </table> <p>A treatment train approach may be used to achieve an Equivalent Target Load Reduction set out in Table 1. The equation below provides an example of how the total load reduction factor of a given treatment chain can be calculated:  <math>R = A + B - [(A \times B)/100]</math>  Where:  R = Total load reduction factor  A = Load reduction factor or the first or upstream treatment device  B = Load reduction factor or the second or downstream treatment device  Additional Device Load Reductions be used to determine whether an Equivalent Target Load Reduction (i.e inputs for A and B) is achieved to that of the Target Load Reduction specified in Table 1.</p> <p>Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc Treatment Device</p> <table border="1"> <thead> <tr> <th>Device</th> <th>Copper</th> <th>Zinc</th> </tr> </thead> <tbody> <tr> <td>Constructed Wetland</td> <td>80%</td> <td>80%</td> </tr> <tr> <td>Swales</td> <td>50%</td> <td>65%</td> </tr> </tbody> </table> <p>Where alternative treatment devices to that of a bioretention/raingarden device are utilised, the specified load reduction factors set out in Table 2 must be used to determine whether an Equivalent Target Load Reduction (i.e inputs for A and B) is achieved to that of the Target Load Reduction specified in Table 1.  [...]</p>	Copper	Zinc	Bioretention (rain garden)	90%	Equivalent Target Load Reduction	90%	Device	Copper	Zinc	Constructed Wetland	80%	80%	Swales	50%	65%
Copper	Zinc																			
Bioretention (rain garden)	90%																			
Equivalent Target Load Reduction	90%																			
Device	Copper	Zinc																		
Constructed Wetland	80%	80%																		
Swales	50%	65%																		
S177.071	12 Schedules	Schedule 29: Stormwater Impact Assessments.	Amend	<p>Seeks amendment to bullet point 3 to remove reference to redeveloped impervious surfaces. No benefit in calculating volume and flow rate of discharges from redeveloped impervious surfaces, as there will be no change to discharge volume and flow rate (when compared to existing).</p> <p>Seeks amendment to bullet point 5 to remove references to wording that is extraneous and difficult</p>	<p>Amend schedule as follows:</p> <p>Schedule 29: Stormwater Impact Assessments</p> <p>A stormwater impact assessment shall include the following analysis:</p> <ol style="list-style-type: none"> <li>1. Site evaluation: the site must be assessed for its topography, soil type, land use, drainage patterns (including wetlands/water courses), natural features, topographical and geotechnical constraints and potential flood areas.</li> </ol>															

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>to interpret. Wording sought to be deleted is generally covered by definition of "water sensitive urban design".</p> <p>Seeks amendment to bullet point 2 under list of matters specific to high risk industrial and trade premises to replace term "contaminants" with "hazardous substances", on as the purpose of the rules is to manage potential entrainment of hazardous substances within stormwater (rather than contaminants generally).</p> <p>Considering cultural considerations under bullet point 8, supports engagement with mana whenua, but seeks clarity about what is anticipated and required by the Council.</p> <p>Supports engagement with mana whenua, but is mindful of the burden this can place on the resources of mana whenua and applicants particularly when engagement is not appropriately targeted or responsive to scale and significance of proposal. While submitter generally supports bullet point 8, also supports improved clarity on Council's expectations with respect to these matters.</p>	<p>2. Catchment evaluation: analyse catchment wide characteristics and requirements (utilising existing local authority stormwater management strategies where available) to consider the proposed development in a broader stormwater discharge and receiving environment context to understand relevant catchment issues, including flooding, climate change projections (frequency and volume), water quality and any additional design or mitigation measures required to address wider catchment matters.</p> <p>3. Stormwater discharge calculation: calculation of stormwater discharge volumes and flow rates along with analysis of stormwater contaminant generation from and new <del>and/or redeveloped</del> impervious surfaces.</p> <p>4. Identification of actual and potential stormwater impacts: undertake evaluation of the actual and potential impacts on the receiving environment, including water quality, natural flow regimes of waterways, soil erosion, flooding, changes in hydrology and climate change (frequency and volume).</p> <p>5. Implementation of Water Sensitive Urban Design principles: provide an analysis of how Water Sensitive Urban Design measures have been identified and incorporated into the site design and layout, building and road/paving materials and <del>features and how existing natural features and</del> new stormwater treatment systems <del>have been enhanced and integrated to mimic natural processes.</del></p> <p>6. Mitigation measures: Assessment of proposed mitigations to reduce the effect of stormwater discharges on water quantity and quality, including the approach to treat in accordance with Schedule 28 (contaminant treatment) and implement hydrological control. Measures must support achieving relevant target attribute states (beyond zinc and copper) for ecosystem health, including nutrients, visual clarity and E. coli or enterococci.</p> <p>7. Operation and maintenance of stormwater management systems: analyse the long-term (life-cycle) operational and maintenance requirements including funding mechanisms and identification of persons responsible for ongoing maintenance.</p> <p>8. Cultural considerations: to be informed by engagement with mana whenua.</p> <p>Where the application includes a high risk industrial or trade premise the stormwater impact assessment analysis must also consider the following:</p> <p>1. Procedures and equipment in place to contain any spillage of hazardous substances for storage or removal, to ensure these are not entrained in stormwater, and</p> <p>2. Management practices proposed to avoid or minimise entrainment of <del>contaminants</del> <b>hazardous substances</b> into stormwater, including reducing contaminant volumes and concentrations as far as practicable, and applying measures, including secondary containment, treatment, management</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					procedures, and monitoring.
S177.072	12 Schedules	A Context	Amend	<p>References to offsetting should be accompanied by references to compensation as there is insufficient certainty about whether the financial contribution will be used (as set out in section E) to address residual stormwater contaminants from new impervious surfaces discharged within catchment (which is offsetting), or whether it will be used to improve water quality across a range of values, not limited to impervious surface contaminants, in whaitua generally (which is compensation).</p> <p>As per submissions on policies WH.P15 and P.P14, considers applicants should be given a reasonable opportunity to undertake their own aquatic offsetting or compensation to address more than minor residual adverse effects, in line with effects management hierarchy provided for under NPS-FM. Considers that "is required" be replaced with "may be required" in final paragraph of section.</p> <p>As per submissions on policies WH.P15 and P.P14, considers that amendment to final paragraph is necessary to reflect that NPS-FM only requires offsetting or compensation in circumstances where residual adverse effects are more than minor.</p>	<p>Amend schedule as follows:</p> <p>A Context</p> <p>Under section 108(2)(a) and (10) of the Resource Management Act 1991, a consent authority may impose a condition on a resource consent requiring a financial contribution to be made for the purpose of offsetting, <b>or compensating for, an environmental adverse effect.</b></p> <p><b>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.</b></p> <p><b>The National Policy Statement for Freshwater Management 2020 requires freshwater quality to be maintained or improved. A financial contribution is may be required to offset or compensate for the adverse environmental effects (where they are more than minor) of the residual stormwater contaminants entering freshwater receiving environments where policy WH.P15 and P.P13 anticipates a deterioration of water quality could arise.</b></p>
<b>S195 - New Zealand Farm Forestry Association</b>					
S195.001	General comments	General comments - plantation forestry	<b>Not Stated Oppose</b>	<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>	Not stated
S195.002	General comments	General comments - overall	<b>Not Stated Oppose</b>	Considers PC1 is not necessary or desirable.	Not stated
S195.004	General	General	<b>Not</b>	Delete merged with above	Not stated



Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	comments	comments - current legislation	<del>Stated</del> Oppose		
S195.005	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	Seeks replanting not be regulated in the proposed plan	Seeks replanting not be regulated in PC1
S195.006	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<p>Considers the proposed rules are a major disincentive for investment in commercial forestry and are likely to negatively impact opportunities to obtain an adequate return. Notes the conditions, or costs of meeting the conditions, will prevent land from being harvested and the "highest risk" classification devalues the land and prevents the forest owner from obtaining an income from it.</p> <p>Considers PC1 will reduce the chances of meeting the Climate Change Commission advice to Government advocating increased planting of exotic forests between 2021 and 2030. Notes PC1 deters the submitter from advising planting trees as a long-term investment.</p> <p>Notes that under the Emissions Trading Scheme, owners are required to retain their land in forests after harvest.</p> <p>Notes if forest land is not replanted, it will generate no income and become a financial liability for the owner, while adding nothing to the region's social and economic wellbeing.</p>	Not stated
S195.008	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<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</p>	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				improvements in water quality. Considers without such evidence, there is no reason to undercut a national environmental standard.	
S195.009	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<p>Consider PC1 will make it impossible for many forest owners to provide for their economic well-being or to make reasonable use of their land. Notes this applies the following situations:</p> <p>Notes where forest land is classed as "highest risk," the owner will not be able to derive any revenue from its post-harvest, despite the continuing costs of rates and property maintenance. Considers small parts of a block classified as erosion prone may be essential for access or for harvest infrastructure. Concerned if they are not used, the forest might not be harvested becoming a stranded asset.</p> <p>Concerned it may be impossible to meet all forestry activities conditions in PC1 such as, meeting the maximum sediment level of 100 grams / m3 of runoff. Considers compliance costs may be simply too high to bother.</p>	Not stated
S195.010	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<p>Considers GWRC have not provided forestry specific evidence related to the Wellington region that demonstrates the NES-PF (and now the NES-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>	Not stated
S195.011	General comments	General comments -	<del>Not Stated</del>	Considers the S32 report with respect to plantation forestry is deficient, incorrect, misleading and devoid	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		plantation forestry	<del>Oppose</del>	<p>of evidence problems are being caused by forestry or current forestry regulations.</p> <p>Considers the report omits mentioning that GWRC could be liable for compensation to China Forestry Group if PC1 goes ahead.</p>	
S195.012	General comments	General comments – rural	<del>Not Stated</del> <del>Oppose</del>	<p>Considers the S32 reports assumption that the NES-CF is focussed on including carbon forestry in the national environmental standards and therefore the PC1 provisions are justified, is incorrect.</p> <p>Considers the NES-CF focuses on stronger environmental protection For example it has new requirements for Afforestation Plans to manage erosion and sedimentation and Harvest Management Plans.</p>	Not stated
S195.013	General comments	General comments - plantation forestry	<del>Not Stated</del> <del>Oppose</del>	<p>Considers the s32 reports statement regarding the NES-PF erosion susceptibility classification system in comparison to the ESC mapping undertaken for Greater Wellington to be incorrect and misleading.</p> <p>Notes the ESC mapping undertaken for Greater Wellington defines the 'highest-risk' land as the most erodible 10% of forest land by area and land use within each Whāitua. Considers this is a relative measure, not an absolute one. Notes that just because land is in the top 10% does not imply that it is at risk of erosion.</p> <p>Notes if Greater Wellington is concerned that the land in its area has been misclassified in the NES-CF, then there are channels to update the mapping and classifications.</p>	Not stated
S195.014	General comments	General comments - plantation forestry	<del>Not Stated</del> <del>Oppose</del>	<p>Considers the S32 report intention to ensure plantation forestry does not establish or endure on highest erosion risk land and the most appropriate management practices are employed is laudable but inadequate.</p> <p>Considers it focuses on relative risk, not absolute risk. Notes if most of the land is erosion prone, then setting a target of 10% is irrelevant. Notes since the</p>	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				classification is by land use, there would always be a 'top 10%' of erosion risk land under plantation forestry and that land's retirement with each successive harvest would lead over time to very little plantation forestry remaining.	
S195.015	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<p>Notes the s32 report considers the notification process for forestry activities in the NES-PF is not fit for purpose, and there is no quality assurance or approval process provided for the notified plans.</p> <p>Considers there is no evidence that the plans provided under the NES-PF and now under the NES-CF are inadequate. Notes recommendations asking the Council to better enforce compliance within the NES-PF rather than seek more stringent regulations. Acknowledges there have been breaches, but that this will happen with any regulation irrespective of its stringency.</p> <p>Notes Regional Council staff will not enforce plans unless there is a complaint. Suggests even Greater Wellington staff are slow to act.</p> <p>Notes Greater Wellington staff are not aware of the content of the current regulations and suggests better resourcing and training, rather than more regulations, would lead to better outcomes.</p>	Not stated
S195.016	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<p>Comments for policy package option 1, for Plantation forestry and woody vegetation clearance and - efficiency and effectiveness of provisions, in the s32 report are as follows:</p> <p>Considers discrepancies in the interpretation of Te Awarua-o-Porirua WIP recommendations 54 and 55 within the S32 report. Suggests that these recommendations do not focus on improving plantation forestry management to reduce sediment, but rather call for changes within the framework of the NES-PF, contradicting the objectives of PC1. Also notes the request for Greater Wellington to work with the industry, which is not happening. Considers PC1 is not an adequate response to these</p>	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>recommendations.</p> <p>Considers that recommendation 37 is not focused on promoting best practices in plantation forestry and monitoring compliance, as highlighted in the S32 report. Notes its focussed on the Council's staffing level and seeks alignment with the NES-PF to enhance outcomes.</p> <p>Considers recommendations WIP 76,77,78 do not require all harvesting to be approved by the Council, or to be a controlled activity.</p> <p>Considers PC1 does not achieve the outcomes sought in the WIP recommendations.</p>	
S195.017	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<p>Comments for policy package options 2 and 3, for plantation forestry and woody vegetation clearance and - efficiency and effectiveness of provisions, in the s32 report are as follows:</p> <p>Considers the analysis confuses relative erosion risk with absolute erosion risk. Considers there is loose terminology, as New Policy uses the term "highest erosion risk" while New Rule uses "very high erosion risk," and the two terms are used synonymously when they are quite different. Very high erosion prone land is defined already in the provisions of the NES-CF and requires no change.</p>	Not stated
S195.018	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<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>	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<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>	
S195.019	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	Delete	Not stated
S195.020	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<p>Disagrees with the assessment that the social costs of Option 1 or 3 will be low. Considers both options would reduce plantation forestry activity in the region, leading to job losses within the industry, at the port, and at regional sawmills dependent on logs from the area. Considers the analysis does not attempt to quantify those impacts.</p> <p>With all three options the submitter disputes that plantation forestry contributes in any significant way to the sedimentation of our rivers and argue PC1 is unnecessary. Considers the NES-CF is quite capable of regulating forestry activities to control sediment flows when enforced.</p>	Not stated
S195.021	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	<p>Considers the analysis in the Section 32 report does not quantify the monetary costs of the options.</p> <p>Notes other significant economic factors are the devaluation of forest land, the reduction of economic activity, and the loss of forest income from both timber and carbon credits.</p> <p>Suggests the economic costs of option 1 are high, and for option 3 are medium as both will increase the costs and create a "negative benefit". Considers the analysis should state this.</p>	Not stated
S195.022	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	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	Not stated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				forestry and may not improve water quality but reduce it.  Considers there are more effective ways of improving water quality than those proposed under PC1.	
S195.023	General comments	General comments - plantation forestry	<del>Not Stated</del> Oppose	Notes the costs of PC1 may outweigh the benefits because as there is no evidence quantifying how much sediment is attributable to which land use, there is a high risk of adding costs without achieving real benefits.	Not stated
S195.025	General comments	General comments - maps	Oppose	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.  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.	<del>Not stated</del> – Remapping is required
S195.028	General comments	General comments - overall	<del>Not Stated</del> Oppose	Considers PC1 needs to be rethought if it is to be effective in controlling the continued degradation of water quality in the region and helping improve the NRP.	Not stated
<b>S202 - Graeme Shellard</b>					
<b>S206 - Winstone Aggregates</b>					
S206.001	General comments	General comments - unplanned greenfield development	Amend	Notes that there is no definition for "greenfield development". Based on the s32 evaluation, considers "greenfield development" to be principally focused on urban development. Concerned the lack of a definition means that all activities may be considered "greenfield development". Seeks the provision of a definition which excludes activities that are not greenfield development, including quarrying activities.	Insert new definition of "greenfield development" as follows: <b>Greenfield development</b> <b>Means any urban development undertaken within a site or sites that has not previously been used for urban land use.</b> <b>Greenfield development does not include:</b> <b>Quarrying activities.</b> Request that "quarrying activities" be noted as a defined term.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S206.014	General comments	General comments - overall	<del>Not Stated</del> Amend	Considers there is a lack of consideration for quarrying activities through the drafting of the rules and the s32 evaluation. Considers that quarrying activities are not specifically anticipated under either of the rules frameworks introduced in PC1 for rural activities or urban activities. Considers that quarrying activities would be captured under the urban related rules, which would be onerous and would restrict continued operation of local quarries. Considers the current approach inconsistent with the RPS, which directs recognition of the benefits of mineral resources and their ongoing use. Considers the proposed approach inconsistent with national direction that provides for clear consenting pathways for beneficial activities such as quarrying activities, noting the NPS-FM and NES for Freshwater in particular. Also notes the NPS-IB and NPS-HPL provide a pathway for aggregate extraction and supply, which is tied with the implementation of the NPS-UD in providing for the necessary infrastructure to deliver well-functioning urban environments.	Seeks specific consenting pathway for the continuation of regionally significant quarrying activities within the Wellington Region.
S206.015	General comments	General comments - overall	<del>Not Stated</del> Oppose	Considers prohibited activity status is not reasonable, based on a wide range of activities that would be captured under the proposed prohibited rules, noting that prohibited activity status is afforded to activities causing significant and unmitigable adverse effect, or that are fundamentally contrary to a planning document. Considers that neither a sufficient evidence base or evaluation has been provided for the prohibited activity status, or for the consideration of alternative activity statuses to appropriately manage the resource management issue. Further considers the non-complying activity status overused and where the purpose of the RMA and objectives of the plan can be met by a less restrictive regime, that it should be adopted, citing an Environment Court decision. Considers discretionary activity status to generally be more efficient and effective and non-complying activity status as a default where an activity is not otherwise provided for inappropriate, noting that quarrying activities would trigger non-complying activity status for earthworks. Considers the proposed approach	<del>Not stated</del> —Seeks that further consideration is given to the activity statuses proposed and whether proportionate evaluation has been given.



Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				inconsistent with national direction that provides for clear consenting pathways for beneficial activities such as quarrying activities, noting the NPS-FM and NES for Freshwater in particular, which provide for a discretionary consenting pathway for quarrying and clean filling activities. Considers non-complying activity status would undermine the ability to implement national direction by bundling resource consent applications into non-complying activity status.	
S206.016	General comments	General comments - definitions	<del>Not Stated</del> Amend	Considers the definition for "high risk industrial or trade premises" would include quarrying activities, despite not resulting in discharges of hazardous substances, and therefore subject to Rules WH.R4, WH.R11 and WH.R12. Considers the inclusion of quarrying activities in these rules unreasonable, and would add onerous consenting requirements for low risk activities. Notes examples of small scale activities that would require resource consent despite all stormwater being captured and treated within the site.	Provision of a specific rule framework for quarrying activities, similar to the approach taken for ports and airports, wherein restricted discretionary activity status applies for most discharges anticipated from an operational quarry. Rules to be linked to the TAS for the related Whaitua. Where a discharge would result in TAS not met for the part of the FMU, activity status to fall to non-complying.
S206.017	General comments	General comments - earthworks	<del>Not Stated</del> Oppose	Considers earthworks (excluding earthworks on a farm) will be at least a restricted discretionary activity, regardless of scale or adverse effect. Notes the conjunctive requirement was not intended for all clauses. Seeks an urgent variation is issued to correct the permitted rule. Notwithstanding this correction, opposes the rule framework and associated policy direction that restricts earthworks over winter months, as it does not account for long-term ongoing permanent earthwork activities that occur year-round, such as quarrying activities. Considers insufficient justification is provided in the s32 evaluation for the shut down period, including an assessment of costs and benefits, or direct and indirect effects to quarrying activities. Considers restrictions will increase cost and length of construction periods, and will impact supply of aggregate. 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	Remove the shutdown period over winter months. Amend non-complying activity status to discretionary.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				winter months as water temperatures are lower and flows are higher. Considers non-complying activity status for earthworks not meeting restricted discretionary conditions is onerous, noting that replacement earthworks consents for an operational quarry would be subject to the rule. Considers this does not recognise the importance of local source aggregate and is contrary to the Regional Policy direction. Notes that where non-complying activity status is in practical terms no different than discretionary activity status, then the less onerous activity status is the most appropriate.	
S206.018	General comments	General comments – maps	<del>Not Stated</del> Amend	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.	Review mapping, or remove and the current approach relied on until robust mapping is undertaken.
S206.019	General comments	General comments - maps	<del>Not Stated</del> Amend	Notes there is no definition for "greenfield development", and that the definition for "unplanned greenfield development" simply refers to greenfield development identified in the PC1 maps. Concerned the lack of a definition means any development in the mapped areas is captured as "greenfield development" and the associated rules. Notes conflict between the PC1 maps and district plan maps. Concerned that stormwater discharge from an impervious surface within an operational quarry that is subject to "unplanned greenfield development" would be a prohibited activity, noting that it is not possible to avoid all stormwater discharges within a quarry. Concerned the approach to managing greenfield development seeks to manage land use its itself, rather than an effect. Concerned that general rules for earthworks, and the creation of impervious surfaces, without any associated discharges to water, overlap with the jurisdiction of territorial authorities. Considers there is insufficient evidence in the s32 evaluation to support prohibiting unplanned greenfield development in all circumstances. Questions the efficiency and effectiveness of the proposed approach, noting there is no ability for joint territorial and regional plan change processes to be considered under the RMA.	Definition of greenfield development (and unplanned greenfield development) is defined to be specific to urban development and does not capture quarrying activities.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				Notes the prohibited rules relates to the coastal marine area, therefore requiring final approval from the Minister for Conservation, and that a district plan change would likely be undertaken after a plan change for the NRP, given that it must not be inconsistent with a regional plan. Concerned with the uncertainty and slowness of the private plan change process, and that resource consent would still be required after a plan change, therefore incurring costs and delays.	
S206.020	General comments	General comments - stormwater management	<b>Not Stated Amend</b>	Considers financial contribution provisions inconsistent with the NPS-FM, and limits the ability to implement the effects management hierarchy. Notes that aquatic offsetting or compensation is required by the NPS-FM where there are more than minor residual adverse effects, rather than residual adverse effects generally. Considers a contribution mechanism to address minor/residual effects unlikely to be effective or efficient, and concerned that financial contributions are the only form of offset that may be provided. Considers it contrary to the NPS-FM to not allow consideration for the principles set out in Appendix 6 of the NPS-FM. Notes the provisions limit the management of residual adverse effects to aquatic offsetting only, whereas the effects management hierarchy provides for aquatic compensation where aquatic offsetting is not able to be provided.	Other forms of aquatic offsetting are provided for and aquatic compensation is enabled where aquatic offsetting can not be achieved. Retain financial contribution offsetting as optional.
S206.021	General comments	General comments - stormwater management	<b>Not Stated Amend</b>	Acknowledges that rules may apply to stormwater discharges to a surface water body from a stormwater network, however considers it is ultra vires to manage effects before this point, citing case law which holds that the regulation of discharges into water under s15 of the RMA does not apply to discharges into the pipes that form a reticulated system.	Make amendments such that rules only relate to discharges from a stormwater network, rather than into a stormwater network.
S206.022	General comments	General comments - fresh water	<b>Not Stated Oppose</b>	Concerned that several provisions are subject to the Freshwater Planning Process (FPP) where freshwater is only a peripheral issue to which the provision relates. Considers this an inappropriate use of the FPP, giving rise to jurisdictional problems such as restricted appeal rights. Considers improper allocation results in delays and costs, and is exacerbated by the restrictive activity statuses proposed.	Review the scope of FPP versus Schedule 1 processes. Only provisions where freshwater is the primary issue to be subject to the FPP; remaining provisions allocated to Schedule 1.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S206.035	8 Whaitua Te Whanganui-a-Tara	Policy WH.P1: Improvement of aquatic ecosystem health.	Amend	<p>Considers (a) requires progressive reduction in the load and concentration of contaminants for all water bodies, regardless of whether improvement is required or not. Seeks clarification accordingly.</p> <p>Considers (b) would apply to all habitats, including exotic. Notes the NPS-FM does not require restoration of all habitats, but is rather limited to indigenous wetland habitat, where the habitat is degraded. Seeks clarification accordingly.</p> <p>Considers it unclear what is being coordinated and prioritised in (d), and what "catchments that require changes to land use activities that impact water" means. Considers the clause should refer to enabling work programmes that provide for improvement. Suggests consideration as to whether clause is better suited as a method rather than a policy directive.</p>	<p>Amend policy as follows:</p> <p>Policy WH.P1: Improvement of aquatic ecosystem health Aquatic ecosystem health will be improved by:</p> <p>(a) progressively reducing the load or concentration of contaminants <b>where improvement in water quality is required</b>, particularly sediment, nutrients, pathogens and metals, entering water, and</p> <p>(b) restoring <b>indigenous habitats that have been degraded</b>, and</p> <p>(c) enhancing the natural flow regime of rivers and managing water flows and levels, including where there is interaction of flows between surface water and groundwater, and</p> <p>(d) co-ordinating and <del>prioritising</del> <b>enabling</b> work programmes in catchments that <b>seek to improve aquatic ecosystem health</b> <del>require changes to land use activities that impact on water.</del></p>
S206.036	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	<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, meaning that development within an area mapped as "unplanned" would be subject to this direction. Considers financial contribution provisions inconsistent with the NPS-FM, and limits the ability to implement the effects management hierarchy. Notes that aquatic offsetting or compensation is required by the NPS-FM where there are more than minor residual adverse effects, rather than residual adverse effects generally. Considers a contribution mechanism to address minor/residual effects unlikely to be effective or efficient, and concerned that financial contributions are the only form of offset that may be provided. Considers it contrary to the NPS-FM to not allow consideration for the principles set out in Appendix 6 of the NPS-FM. Notes the provisions limit the management of residual adverse effects to aquatic offsetting only, whereas the effects management hierarchy provides for aquatic compensation where aquatic offsetting is not able to be provided. Acknowledges financial contributions may be an</p>	<p>Amend policy as follows:</p> <p>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:</p> <p>(a) <del>prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the contaminants <b>generated by urban development, and where there are more than minor residual adverse effects caused by stormwater contaminants requiring aquatic offsetting in first instance, which may include a</b> <del>requiring financial contributions as to</del> <b>an aquatic</b> <del>offset adverse effects from residual stormwater contaminants,</del> and</p> <p>(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</p> <p>(c) imposing hydrological controls on urban development and stormwater discharges to rivers</p> <p>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</p> <p>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation <b>where practicable</b>, and</p> <p>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</p> <p>(g) soil conservation treatment, including revegetation with woody vegetation,</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>appropriate form of aquatic offset, however seeks the policy does not frustrate the ability for other forms of aquatic offsetting or aquatic compensation.</p> <p>Supports the direction of clause (e), however notes the planting of riparian margins may not always be practicable.</p>	<p>of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</p>
S206.038	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater	Amend	<p>Considers the requirement that all discharges "shall not degrade" is not clear or directly measurable. Considers direction should be focused on "maintaining" groundwater quality based on its use, in accordance with NPS-FM Policy 5. Notes there is no indication on what "degraded groundwater" means, and considers it must be aligned with a limit depending on the use of the groundwater. Seeks the policy is split into two sentences to improve clarity.</p>	<p>Amend policy as follows:</p> <p>Policy WH.P7: Discharges to groundwater All discharges to land that may enter groundwater, and discharges to groundwater, shall <b>maintain</b> not degrade the quality of groundwater <b>quality to continue to provide for its existing and future use.</b> and <del>where the quality of groundwater quality is not meeting national guidelines is degraded, existing discharges shall be managed in a way that to improves groundwater quality.</del></p>
S206.063	9 Te Awarua-o-Porirua Whaitua	Policy P.P1: Improvement of aquatic ecosystem health.	Amend	<p>Considers (a) requires progressive reduction in the load and concentration of contaminants for all water bodies, regardless of whether improvement is required or not. Seeks clarification accordingly.</p> <p>Considers (b) would apply to all habitats, including exotic. Notes the NPS-FM does not require restoration of all habitats, but is rather limited to indigenous wetland habitat, where the habitat is degraded. Seeks clarification accordingly.</p> <p>Considers it unclear what is being coordinated and prioritised in (d), and what "catchments that require changes to land use activities that impact water" means. Considers the clause should refer to enabling work programmes that provide for improvement. Suggests consideration as to whether clause is better suited as a method rather than a policy directive.</p>	<p>Amend policy as follows:</p> <p>Policy P.P1: Improvement of aquatic ecosystem health Aquatic ecosystem health will be improved by:</p> <p>(a) progressively reducing the load or concentration of contaminants <b>where improvement in water quality is required</b>, particularly sediment, nutrients, pathogens and metals, entering water, and</p> <p>(b) restoring <b>indigenous habitats that have been degraded</b>, and</p> <p>(c) enhancing the natural flow regime of rivers and managing water flows and levels, including where there is interaction of flows between surface water and groundwater, and</p> <p>(d) co-ordinating and <del>prioritising</del> <b>enabling</b> work programmes in catchments <b>that seek to improve aquatic ecosystem health require changes to land use activities that impact on water.</b></p>
S206.064	9 Te Awarua-o-Porirua Whaitua	Policy P.P2: Management of activities to achieve target attribute states and coastal	Oppose	<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, meaning that development within an area mapped as "unplanned" would be subject to this direction. Considers financial contribution provisions inconsistent with the NPS-FM, and limits the ability to</p>	<p>Amend policy as follows:</p> <p>Policy P.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:</p> <p>(a) <del>prohibiting unplanned greenfield development and for other greenfield</del></p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		water objectives.		<p>implement the effects management hierarchy. Notes that aquatic offsetting or compensation is required by the NPS-FM where there are more than minor residual adverse effects, rather than residual adverse effects generally. Considers a contribution mechanism to address minor/residual effects unlikely to be effective or efficient, and concerned that financial contributions are the only form of offset that may be provided. Considers it contrary to the NPS-FM to not allow consideration for the principles set out in Appendix 6 of the NPS-FM. Notes the provisions limit the management of residual adverse effects to aquatic offsetting only, whereas the effects management hierarchy provides for aquatic compensation where aquatic offsetting is not able to be provided. Acknowledges financial contributions may be an appropriate form of aquatic offset, however seeks the policy does not frustrate the ability for other forms of aquatic offsetting or aquatic compensation.</p> <p>Supports the direction of clause (e), however notes the planting of riparian margins may not always be practicable.</p>	<p><del>developments</del>–minimising the contaminants <b>generated by urban development, and where there are more than minor residual adverse effects caused by stormwater contaminants requiring aquatic offsetting in first instance, which may include a</b> requiring financial contributions as <del>to</del> <b>an aquatic</b> offset adverse effects from residual stormwater contaminants, and</p> <p>(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</p> <p>(c) imposing hydrological controls on urban development and stormwater discharges to rivers</p> <p>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</p> <p>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation <b>where practicable</b>, and</p> <p>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</p> <p>(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</p> <p>(h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</p>