

Appendix 1: Description of matters raised by Submitters (by issue)

Issue 1: General support for PC1

Sub-issue(s)	Description of matters raised by submitters
General support	<p>24 submitters generally support PC1. These are summarised below.</p> <p>Lynn Cadenhead [S22.005], Amos Mann [S35.002], Pamela Govan [S40.001], Yvonne Weeber [S183.001] (supported by MPHRCI [FS27.001] and Tama Potaka [FS42.002]), Guardians of the Bays Inc [S186.001] (supported by MPHRCI [FS27.424]) and Anya Pollock [S242.002] support the direction of PC1, with no specific relief sought.</p> <p>Lynn Cadenhead [S22.026], Neil Deans [S29.013] and Mary Hutchinson [S115.006] support policies WH.P1-P.33 as notified, including the associated target attribute states and flow requirements. Lynn Cadenhead [S22.027] and Neil Deans [S29.014] also support Rules WH.R1-WH.R36, however seek for WSUD to be required where possible to minimise increased run-off intensity.</p> <p>Lara Keane [S27.001] supports the PC1 provisions regarding water and the Te Whanganui-a-Tara catchment objectives.</p> <p>Jonny Osborne [S28.001] supports the direction of PC1 and seeks for councillors to support the changes through to implementation.</p> <p>Simon Wright [S99.001] supports PC1 and rules and incentives that will make development more sustainable.</p> <p>Friends of Waipāhihi Karori Stream [S107.001] support the direction of PC1 and consider that strong implementation and enforcement of regulation is necessary to address aging infrastructure, inappropriate urban development and poor land use practices.</p> <p>Zealandia [S113.001] (supported by Forest & Bird [FS23.1511]) supports the intent to stop further degradation of freshwater bodies in the Wellington region, as well as the collaborative planning process involving Whaitua committees. Zealandia [S113.002] (supported by Forest & Bird [FS23.1512]) further supports the implementation of the proposed changes in the timeframes proposed to ensure that Wellington continues to be an exemplar of urban biodiversity management and further degradation of freshwater is halted.</p> <p>Eugene Doyle [S178.001 and S178.002] supports PC1, however considers it must be integrated with functions and initiatives of other statutory authorities, with effective community engagement.</p> <p>Eight submitters¹ support PC1 and initiatives to improve water quality, and seek that initiatives are carried through to the operative plan.</p> <p>UHCC [S225.024] (opposed by Forest & Bird [FS23.852]) supports the intent to develop regional provisions to achieve water quality and ecological health objectives within the whaitua, with no specific relief sought.</p> <p>Water NZ [S246.001] broadly supports PC1 and its focus on water quality and ecological health objectives to implement the NPS-FM.</p> <p>Water NZ [S246.017] supports the inclusion of terms such as containment standard, core allocation, hydrological control, impervious surfaces, stormwater catchment, stormwater treatment system, wastewater network catchment and wet weather overflows.</p>

Issue 2: General opposition to PC1

Sub-issue(s)	Description of matters raised by submitters
General oppose	Six submitters ² oppose PC1 or do not support it in its current form, with no specific relief sought.
Withdrawal of PC1	67 submitters seek PC1 be withdrawn. These are summarised below.

¹ Ray Beentjes [S185.003], Victoria University Canoe Club [S187.003], Greg Davies [S197.003], Calum Bradbury [S233.003], Shonaugh Wright [S235.003], Andrew Esler [S244.003], John Western [S253.003] and Todd Henry [S283.003]

² Mākara and Ohariu large farms [S51.001], John Boyle [S181.002], Susan Boyle [S182.002], NZFFA [S195.002] (opposed by Forest & Bird [FS23.405]), Julie Martin [S208.001] and Te Marama [S231.001]

Sub-issue(s)	Description of matters raised by submitters
	<p>Four submitters³ seek the withdrawal of PC1 due to concerns with lack of consultation. An additional 38 submitters⁴ seek specific relief for further consultation to be undertaken as well.</p> <p>Tracy Simms⁵ seeks the withdrawal of PC1, noting the following reasons:</p> <ul style="list-style-type: none"> • Lack of consultation with affected properties • The appropriateness of provisions being applied to both upstream and downstream properties despite there being few monitoring sites • Insufficient water quality information to confirm where sediment is originating from <p>John Boyle [S181.003 and S181.005], Susan Boyle [S182.003 and S182.005], The Maymorn Collective⁶ and Dean Spicer [S30.001, S30.002 and S30.003] raise concerns with a lack of consultation, inconsistency with UHCC Plan Change 50, and a lack of a specialist economic impact assessment, consequently seeking the following relief:</p> <ul style="list-style-type: none"> • The withdrawal of PC1 • Appropriate consultation and engagement to be undertaken • An economic, social and cultural impact assessment to inform a revised plan change <p>Peter Thomson [S203.002] seeks the withdrawal of PC1 until the new NPS-FM is released. Similarly, Best Farm & Others [S254.004]⁷ seeks the withdrawal of PC1, or alternatively that the hearing is suspended until there is clearer direction from the new government.</p> <p>Cuttriss⁸, Carrus⁹ and Thames Pacific¹⁰ oppose PC1 in its current form and seek for it to be withdrawn to enable consultation, considerations of matters raised through the submission process, and consideration of new direction from central government, noting the following:</p> <ul style="list-style-type: none"> • That there is insufficient certainty or clarity in the implementation of rules. • That there will be significant financial impacts, particularly on pre-committed development projects. • That given the impact and extent of the proposed changes, the publication of a draft plan and consultation with the development community would minimise potential appeals and aid towards a more workable and functioning Natural Resources Plan. • That GWRC should wait to see what changes to the NPS-FM are proposed by the new government coalition to ensure PC1 is in alignment. • That PC1 was rushed as the plan does not need to be notified until 31st December 2024. • That the imposition of new rules with immediate legal effect is inconsistent with subpart 1 of the NPS-FM as there is still a significant amount of time before the plan change must be notified.

³ Callum Forbes [S92.001], Michael Marfell-Jones [S114.001], Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.001] and M. Garcia [S287.001]

⁴ Robert Anker [S59.001] (opposed by MPHRCI [FS27.1250]), Darren Pettengell [S60.001] (opposed by MPHRCI [FS27.1328]), Lenard Drabble [S61.001] (opposed by MPHRCI [FS27.1497]), Jacqui Thompson [S62.001] (opposed by MPHRCI [FS27.1393]), Callum Graeme Ritchie Forbes [S63.001] (opposed by MPHRCI [FS27.1302]), Linda Forbes Williamson [S64.001] (opposed by MPHRCI [FS27.1510]), Darren Pettengell [S65.001] (opposed by MPHRCI [FS27.1588]), Jon-Luke Clarke Harvey [S66.001] (opposed by MPHRCI [FS27.1458]), Darren Pettengell [S67.001] (opposed by MPHRCI [FS27.1562]), Gail Thomson [S68.001] (opposed by MPHRCI [FS27.1354]), Susan Patricia Boyle [S69.001] (opposed by MPHRCI [FS27.1614]), John Peter Boyle [S70.001] (opposed by MPHRCI [FS27.1445]), Brendon Allen Greig [S71.001] (opposed by MPHRCI [FS27.1276]), Angela Marie Greig [S72.001] (opposed by MPHRCI [FS27.1263]), Philip Eales [S73.001] (opposed by MPHRCI [FS27.1575]), Teresa Eales [S74.001] (opposed by MPHRCI [FS27.1627]), Lynn Marion Bialy [S75.001] (opposed by MPHRCI [FS27.1523]), Richard Charles Bialy [S76.001] (opposed by MPHRCI [FS27.1601]), JoAnn McCready [S77.001] (opposed by MPHRCI [FS27.1432]), Bob Curry [S78.001] (opposed by MPHRCI [FS27.1237]), Bob McLellan [S79.001] (opposed by MPHRCI [FS27.1224]), Bridget M Myles [S80.001] (opposed by MPHRCI [FS27.1289]), David McCready [S81.001] (opposed by MPHRCI [FS27.1341]), Meaghan Fitzgerald [S82.001] (opposed by MPHRCI [FS27.1536]), Kevin Nash [S83.001] (opposed by MPHRCI [FS27.1484]), Karen Nash [S84.001] (opposed by MPHRCI [FS27.1471]), Jennifer Sparrow [S86.001] (opposed by MPHRCI [FS27.1406]), Grant Munro [S87.001] (opposed by MPHRCI [FS27.1380]), Colleen Munro [S88.001] (opposed by MPHRCI [FS27.1315]), Joan Elizabeth Hutson [S89.001] (opposed by MPHRCI [FS27.1419]), Peter Jeffery Hutson [S90.001] (opposed by MPHRCI [FS27.1549]), Graeme Shellard [S91.001] (opposed by MPHRCI [FS27.1367]), Jo McCready [S94.001] (supported in part by Meridian [FS47.001]), Sera Moran [S196.001 and S196.002], the Shellards [S202.002 and S202.005], Kelly & Lewis Few-Mackay [S205.001], John and Jacqueline Diggins [S250.002] and Robert Pavis-Hall, Gaynor Rowswell, Katie Norman, Megan Norman [S273.001, S273.002 and S273.006].

⁵ [S175.001] (supported in part by Meridian [FS47.015], opposed by Tama Potaka [FS42.001]), [S175.002] and [S175.004]

⁶ Amanda and Rami Mounla - Marita Manns Trustee Limited [S265.001 and S265.003], Tamara Hrstich [S266.001 and S266.003], Marlruk Agistments Ltd - Richard and Lynn Bialy [S267.001 and S267.003], Bruce Bates and Kim Cheeseman [S268.001 and S268.003], Paul and Megan Persico [S269.001 and S269.003], Dean and Michelle Spicer and Benjamin Shaw (as Trustees for Bridgewater Trust) [S270.001 and S270.003], John and Susan Boyle [S271.001 and S271.003], Philip and Teresa Eales [S272.001 and S272.003].

⁷ supported by Peka Peka Farm [FS29.008], supported in part by Meridian [FS47.044], with a neutral/not stated stance from Woodridge [FS16.012]

⁸ [S219.002] (supported by Best Farm & Others [FS38.001 and FS38.013], Land Matters [FS13.062] and Peka Peka Farm [FS29.010], supported in part by Meridian [FS47.016], with a neutral/not stated stance from Woodridge [FS16.001 and FS16.023]); [S219.004] (supported by Best Farm & Others [FS38.003], Land Matters [FS13.064] and Orogen Limited [FS34.022], supported in part by Meridian [FS47.017], with a neutral/not stated stance from Woodridge [FS16.003]); and [S219.005] (supported by Best Farm & Others [FS38.004], Land Matters [FS13.065] and Orogen Limited [FS34.023], supported in part by Meridian [FS47.018], with a neutral/not stated stance from Woodridge [FS16.007])

⁹ [S247.002] (supported by Best Farm & Others [FS38.005], supported in part by Meridian [FS47.037], opposed by MPHRCI [FS27.1191], with a neutral/not stated stance from Woodridge [FS16.004]); [S247.004] (supported by Best Farm & Others [FS38.007], supported in part by Meridian [FS47.039] and Orogen Limited [FS34.002], opposed by MPHRCI [FS27.1193], with a neutral/not stated stance from Woodridge [FS16.006]); and [S247.005] (supported by Best Farm & Others [FS38.008], supported in part by Meridian [FS47.040], opposed by MPHRCI [FS27.1194], with a neutral/not stated stance from Woodridge [FS16.008])

¹⁰ [S252.002] (supported in part by Meridian [FS47.041]), [S252.004] (supported in part by Meridian [FS47.042]) and [S252.005] (supported in part by Meridian [FS47.043])

Sub-issue(s)	Description of matters raised by submitters
	<p>In multiple submission points, Gillies¹¹, Pukerua Holdings¹², Koru Homes¹³ and Arakura Plains¹⁴ oppose the entirety of PC1 and seek its withdrawal to allow for a comprehensive review of the policy and rule framework as it relates to freshwater management (including stormwater management and earthworks), citing unintended consequences of drafting errors, given the provisions have immediate legal effect; and impacts on housing affordability and land development. If the withdrawal of PC1 should not occur, the submitters seek the relief set out in their respective submissions and any other consequential relief to give effect to the decisions sought as part of the submissions.</p> <p>Pukerua Property Group¹⁵ and Land Matters¹⁶ oppose PC1 and seek its withdrawal, raising the following concerns:</p> <ul style="list-style-type: none"> • Considers PC1 has significant consequences for housing affordability and land development, with specific concern regarding proposed financial contribution requirements being inconsistent with the NPS-UD. • Notes haste in the preparation of PC1, with reference to the Clause 16 memo amending errors in rules. • Notes the agreements of the government coalition to remove/replace legislation. <p>In three submission points, Woodridge¹⁷ seeks the withdrawal of PC1, as well as the following relief:</p> <ul style="list-style-type: none"> • Consultation with all relevant parties before releasing a replacement, due to a concern with lack of consultation with landowners and the development community • Review and amendment of all provisions, in relation to insufficient consideration being given to the NPS-UD • Review objectives, policies and rules, and removal of duplications by combining where possible, noting that complication is created from the repetition of objectives, policies and rules for different catchments. <p>NZCF [S263.006] (opposed by Forest & Bird [FS23.377]) seeks that PC1 is withdrawn due to submissions on Proposed Change 1 of the RPS still being heard, and that the result of RPS Proposed Change 1 will be relevant to the NRP.</p>
Redrafting of PC1	<p>Dean Spicer [S30.004], John Boyle [S181.006], Susan Boyle [S182.006] and the Maymorn Collective¹⁸ seek for PC1 to be redrafted and renotified for consultation, noting the following reasons:</p> <ul style="list-style-type: none"> • That PC1 contains errors in drafting and fails to define what some key terms mean. • That the approach prevented stakeholders from understanding what is proposed and being able to be consulted and making well informed submissions. <p>Upper Hutt Rural Communities¹⁹, Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.007] and M. Garcia [S287.009] consider there are errors in drafting which change the intended meaning and seek for a review and edit of PC1 to be undertaken.</p>

¹¹ [S161.001] (supported in part by Meridian [FS47.002])

¹² [S165.001], [S165.002] (supported in part by Meridian [FS47.003]) and [S165.003]

¹³ [S169.041] (supported in part by Meridian [FS47.005]), [S169.042] (supported in part by Meridian [FS47.006]), [S169.043] (supported in part by Meridian [FS47.007]), [S169.044] (supported in part by Meridian [FS47.008]), [S169.045] (supported in part by Meridian [FS47.009]), [S169.046] (supported in part by Meridian [FS47.010]) and [S169.048] (supported in part by Meridian [FS47.012]), Koru Homes [S169.052]

¹⁴ Arakura Plains [S173.001] (supported in part by Meridian [FS47.014])

¹⁵ [S241.001] (supported in part by Land Matters [FS13.002] and Meridian [FS47.030]); [S241.002] (supported in part by Land Matters [FS13.003]); [S241.003] (supported in part by Land Matters [FS13.004] and Meridian [FS47.031]); [S241.004] (supported in part by Land Matters [FS13.005] and Meridian [FS47.032])

¹⁶ [S243.033] (supported by Best Farm & Others [FS38.009], supported in part by Meridian [FS47.035], with a neutral/not stated stance from Woodridge [FS16.013]) and [S243.034] (supported by Best Farm & Others [FS38.010], supported in part by Meridian [FS47.036], with a neutral/not stated stance from Woodridge [FS16.014])

¹⁷ [S255.001] (supported by Orogen Limited [FS34.033], supported in part by Meridian [FS47.045]), [S255.002] and [S255.004]

¹⁸ Amanda and Rami Mounla - Marita Manns Trustee Limited [S265.004], Tamara Hrstich [S266.004], Marluk Agistments Ltd - Richard and Lynn Bialy [S267.004], Bruce Bates and Kim Cheeseman [S268.004], Paul and Megan Persico [S269.004], Dean and Michelle Spicer and Benjamin Shaw (as Trustees for Bridgewater Trust) [S270.004], John and Susan Boyle [S271.004], Philip and Teresa Eales [S272.004]

¹⁹ Bob Anker [S59.007] (opposed by MPHRCI [FS27.1256]), Darren Pettengell [S60.007] (opposed by MPHRCI [FS27.1334]), Lenard Drabble [S61.007] (opposed by MPHRCI [FS27.1503]), Jacqui Thompson [S62.007] (opposed by MPHRCI [FS27.1399]), Callum Graeme Ritchie Forbes [S63.007] (opposed by MPHRCI [FS27.1308]), Linda Forbes Williamson [S64.007] (opposed by MPHRCI [FS27.1516]), Darren Pettengell [S65.007] (opposed by MPHRCI [FS27.1594]), Jon-Luke Clarke Harvey [S66.007] (opposed by MPHRCI [FS27.1464]), Darren Pettengell [S67.007] (opposed by MPHRCI [FS27.1568]), Gail Thomson [S68.007] (opposed by MPHRCI [FS27.1360]), Susan Patricia Boyle [S69.007] (opposed by MPHRCI [FS27.1620]), John Peter Boyle [S70.007] (opposed by MPHRCI [FS27.1451]), Brendon Allen Greig [S71.007] (opposed by MPHRCI [FS27.1282]), Angela Marie Greig [S72.007] (opposed by MPHRCI [FS27.1269]), Philip Eales [S73.007] (opposed by MPHRCI [FS27.1581]), Teresa Eales [S74.007] (opposed by MPHRCI [FS27.1633]), Lynn Marion Bialy [S75.007] (opposed by MPHRCI [FS27.1529]), Richard Charles Bialy [S76.007] (opposed by MPHRCI [FS27.1607]), JoAnn McCready [S77.007] (opposed by MPHRCI [FS27.1438]), Bob Curry [S78.007] (opposed by MPHRCI [FS27.1243]), Bob McLellan [S79.007] (opposed by MPHRCI [FS27.1230]), Bridget M Myles [S80.007] (opposed by MPHRCI [FS27.1295]), David McCready [S81.007] (opposed by MPHRCI [FS27.1347]), Meaghan Fitzgerald [S82.007] (opposed by MPHRCI [FS27.1542]), Kevin Nash [S83.007] (opposed by MPHRCI [FS27.1490]), Karen Nash [S84.007] (opposed by MPHRCI [FS27.1477]), Jennifer Sparrow [S86.007] (opposed by MPHRCI [FS27.1412]), Grant Munro [S87.007] (opposed by MPHRCI [FS27.1386]), Colleen Munro [S88.007] (opposed by MPHRCI [FS27.1321]), Joan Elizabeth Hutson [S89.007] (opposed by MPHRCI [FS27.1425]), Peter Jeffery Hutson [S90.007] (opposed by MPHRCI [FS27.1555]), Graeme Shellard [S91.007] (opposed by MPHRCI [FS27.1373])

Sub-issue(s)	Description of matters raised by submitters
Rules with legal effect	<p>Upper Hutt Rural Communities²⁰; Michael Marfell-Jones [S114.003]; Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.005]; and M. Garcia [S287.005] seek the deletion of the “immediate legal effect” statement in the Section 32 report, to be replaced with the following text: “<i>all rules in this plan change will be held in abeyance pending the plan change passing through all stages required by the RMA.</i>”</p> <p>NZTA [S275.001] (opposed by Forest & Bird [FS23.695]) seeks the removal of the immediate legal effect of provisions via a variation, due to concerns about the scale of changes proposed and the timeframes for their implementation and that these costs have not been sufficiently considered in the section 32 report.</p>

Issue 3: General comments

Sub-issue(s)	Description of matters raised by submitters
Broad/overarching concerns	<p>John Easterher [S17.029] raises concerns that the timeframes and expectations on landowners to achieve PC1’s long-term goals are unrealistic.</p> <p>Christine Stanley [S26.003 and S26.004] raises concerns with the ability of PC1 to achieve the desired outcomes and GWRC’s ability to monitor, manage or respond to pollution. Similarly, NZFFA [S195.028] (opposed by Forest & Bird [FS23.431]) 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.</p> <p>Riu Huna Farm [S39.005] raises the following concerns:</p> <ul style="list-style-type: none"> • That the transition time should be determined by the implementation of the new freshwater regulations by central government. • That GWRC is acting prematurely and duplicating the process, adding costs for landowners and GWRC as well as reducing the available time to understand the problems that are trying to be solved. • That PC1 is a blunt instrument attempting to compensate for the lack of ‘actual’ local water quality information by proposing broad rules across multiple catchments rather than targeting usable and effective interventions for the best outcomes. • That wide-ranging proposed regulatory implications will create additional financial and time costs on community and there is a strong risk of not achieving the outcomes efficiently or effectively. • That many people will be non-compliant within a short timeframe and face prosecution. • That the proposed time to transition between current land use and implementing the proposed changes is unrealistically short and does not account for significant financial implications and requires potentially unneeded changes in our farm system and in land use. • That solutions are best achieved on-farm by individual properties rather than through a wider approach based on the current whitua or “Freshwater Management Unit”. • That many small streams cross property boundaries and therefore must be implemented and monitored at an appropriate scale. • There is potential for perverse outcomes as these measures impose more cost and reduce the ability of farmers to operate economically. <p>Pikarere Farm [S199.001] considers PC1 is complicated and difficult to understand, and questions if the approach is correct, noting that properties can vary greatly with steeper hill areas no more prone to erosion or run-off than valley floors.</p> <p>HCC [S211.001] (opposed by Forest & Bird [FS23.347]) supports the intent of PC1, however raises concern with the inclusion of the 2040 E. coli target, and the prohibition of unplanned urban growth.</p>

²⁰ Bob Anker [S59.005] (opposed by MPHRCI [FS27.1254]), Darren Pettengell [S60.005] (opposed by MPHRCI [FS27.1332]), Lenard Drabble [S61.005] (opposed by MPHRCI [FS27.1501]), Jacqui Thompson [S62.005] (opposed by MPHRCI [FS27.1397]), Callum Graeme Ritchie Forbes [S63.005] (opposed by MPHRCI [FS27.1306]), Linda Forbes Williamson [S64.005] (opposed by MPHRCI [FS27.1514]), Darren Pettengell [S65.005] (opposed by MPHRCI [FS27.1592]), Jon-Luke Clarke Harvey [S66.005] (opposed by MPHRCI [FS27.1462]), Darren Pettengell [S67.005] (opposed by MPHRCI [FS27.1566]), Gail Thomson [S68.005] (opposed by MPHRCI [FS27.1358]), Susan Patricia Boyle [S69.005] (opposed by MPHRCI [FS27.1618]), John Peter Boyle [S70.005] (opposed by MPHRCI [FS27.1449]), Brendon Allen Greig [S71.005] (opposed by MPHRCI [FS27.1280]), Angela Marie Greig [S72.005] (opposed by MPHRCI [FS27.1267]), Philip Eales [S73.005] (opposed by MPHRCI [FS27.1579]), Teresa Eales [S74.005] (opposed by MPHRCI [FS27.1631]), Lynn Marion Bialy [S75.005] (opposed by MPHRCI [FS27.1527]), Richard Charles Bialy [S76.005] (opposed by MPHRCI [FS27.1605]), JoAnn McCready [S77.005] (opposed by MPHRCI [FS27.1436]), Bob Curry [S78.005] (opposed by MPHRCI [FS27.1241]), Bob McLellan [S79.005] (opposed by MPHRCI [FS27.1228]), Bridget M Myles [S80.005] (opposed by MPHRCI [FS27.1293]), David McCready [S81.005] (opposed by MPHRCI [FS27.1345]), Meaghan Fitzgerald [S82.005] (opposed by MPHRCI [FS27.1540]), Kevin Nash [S83.005] (opposed by MPHRCI [FS27.1488]), Karen Nash [S84.005] (opposed by MPHRCI [FS27.1475]), Jennifer Sparrow [S86.005] (opposed by MPHRCI [FS27.1410]), Grant Munro [S87.005] (opposed by MPHRCI [FS27.1384]), Colleen Munro [S88.005] (opposed by MPHRCI [FS27.1319]), Joan Elizabeth Hutson [S89.005] (opposed by MPHRCI [FS27.1423]), Peter Jeffery Hutson [S90.005] (opposed by MPHRCI [FS27.1553]), Graeme Shellard [S91.005] (opposed by MPHRCI [FS27.1371])

Sub-issue(s)	Description of matters raised by submitters
	UHCC [S225.025] ²¹ raises concerns with process, timing, and sequencing of aspects of the notified provisions of PC1 require significant amendments, noting numerous instances throughout PC1 where little regard to national policy direction and principles of natural justice have been considered and reasonableness /evidence base and practical implementation of provisions has been inconsistently applied. Concerned with real-world financial and resource implications, particularly for territorial authority policy and road controlling authority functions.
General suggestions	<p>Jonny Osborne [S28.002 and S28.003] considers addressing matters like aging and leaky infrastructure, inappropriate urban development and poor land use practices takes a strong (and enforced) regulatory backbone. Supports measures that will end harmful wastewater entering directly into streams and coastal waters, WSUD implemented across the region, and rural and forestry practices improved so they no longer harm waterways and wildlife.</p> <p>Friends of Waipāhihi Karori Stream [S107.009] consider councils need to prioritise better to focus on the basics and new sources of funding can be found with the right leadership.</p> <p>Susan Sturman [S119.002] notes the following:</p> <ul style="list-style-type: none"> • Considers that fines should be enforced for contaminant discharges. • Concerned about the goals and timeframes set. Suggests small, achievable, and measurable goals should be the focus and then assess the value provided and use feedback and innovation to continuously improve interventions. • Considers that restoring water quality, preventing flooding, and protecting water supply is critical for council to fund and manage. Encourages councils to collectively resource enforcement, science, and complementary policy tools like education, industrial water plans, community governance, and citizen water-care activity. <p>Fish and Game [S188.008]²² considers it vital to manage stormwater, wastewater network catchment, and wastewater treatment plant discharges. Considers management and action plans should be SMART: Specific, Measurable, Ambitious but reasonable, Relevant, and Time-bound.</p>
Support of other submissions	<p>Louise Askin [S9.001] supports the group submission made by Mākara/Ohariu farmers (S51).</p> <p>Eugene Doyle [S178.003] supports the submissions of Neil Deans (S29) and Lynn Cadenhead (S22).</p> <p>John Boyle [S181.001], Susan Boyle [S182.001] and Megan Persico [S214.003] each support the Maymorn Collective’s submission (S265-272).</p> <p>Peter Thomson [S203.001] and Tim Moody [S218.001] each support the submission of Robert Anker (S59).</p> <p>Anya Pollock [S242.001] supports the submission of Friends of Waipāhihi Karori Stream (S107).</p>

Issue 4: Consultation

Sub-issue(s)	Description of matters raised by submitters
Insufficient consultation	<p>In addition to submitters specifically seeking the withdrawal of PC1 due to insufficient consultation (discussed in Issue 1), 77 submitters²³ also raise general concerns with the consultation process for PC1, ranging from general lack of consultation with affected landowners/stakeholders; that the submission period was not long enough; and that information on PC1 was not circulated appropriately (e.g. mail, email, meetings, etc.).</p> <p>Akatarawa Valley Residents²⁴ and the Shellards [S202.004] seek specifically that the PC1 process is stopped immediately until government direction is clear; they further seek that all documents related to PC1 be communicated in accordance with the Plain Language Act 2002.</p>

²¹ supported by Gillies [FS11.011] and Pukerua Holdings [FS30.011], opposed by Forest & Bird [FS23.853], with a neutral/not stated stance from Woodridge [FS16.015]

²² supported by Forest & Bird [FS23.1164], MPGC [FS21.013] and MPHRCI [FS27.1097], opposed by NZFFA [FS9.008]

²³ Kim Bowen [S103.003]; Mary Hutchinson [S115.002]; John Bowen [S117.003]; Wayne Robert Pettersson and Maureen Pettersson [S118.002]; Bede Crestani [S14.001]; Pauatahanui Residents Association [S16.001]; William Gill [S180.001]; Julie Martin [S208.002]; Terawhiti Farming Co Ltd [S224.002] (supported in part by Meridian Energy Limited [FS47.020]); Te Kamaru Station Ltd [S229.002] (supported in part by Meridian Energy Limited [FS47.025]); Te Marama Ltd [S231.003]; David and Pauline Innes [S234.010]; Best Farm Ltd, Lincolnshire Farm Ltd, Hunters Hill Ltd & Stebbings Farmlands Ltd [S254.001] (with a neutral/not stated stance from Woodridge Holdings Ltd [FS16.009]); Robert Pavis-Hall, Gaynor Rowswell, Katie Norman, Megan Norman [S273.008]; Craig Innes [S277.008]; Kirsty Gill [S281.002]; Fenaughty Partnership - Riu Huna Farm [S39.002 and S39.003]; Maryanne Gill [S42.003 and S42.008]; Mākara and Ohariu large farms [S51.002 and S51.005]; Sally Kean [S57.005]; Louise Askin [S9.007]; Urban Edge Planning Group on behalf of M & J Walsh Partnership Ltd [S96.001]; Urban Edge Planning Group on behalf of Pandion Limited [S98.003]

²⁴ John & Jill Van Nortwick [S120.001 and S120.003], Karen Wallace & Mark Robbins [S121.001 and S121.003], Paul & Steph Lambert [S122.001 and S122.003], Sandy Cooper [S123.001 and S123.003], Fredrick Steensma [S124.001 and S124.003], Shoshanah Phillips [S125.001 and S125.003], Russell Judd & Cecile Judd [S126.001 and S126.003], Johanna Overdiep & Steve Sturgess [S127.001 and S127.003], Joany Grima & Allen Rockell [S128.001 and S128.003], Keith Budd & Liz Budd [S129.001 and S129.003], Pete Clark [S130.001 and S130.003], Gillian Taylor & Chris Taylor [S131.001 and S131.003], Hannah Dawson & Ryan Dawson [S132.001 and S132.003], Len Drabble [S133.001 and S133.003], Graeme Allan [S134.001 and S134.003], Joshua Wood [S135.001 and S135.003], Micayla Wood [S136.001 and S136.003], Jonathan Wood [S137.001 and S137.003], Tony Wood & Helen Wood [S138.001 and S138.003], Glenda Arnold [S139.001 and S139.003], Janet Collins

Sub-issue(s)	Description of matters raised by submitters
	<p>Fish and Game²⁵ consider it is important to include stakeholders who have statutory responsibilities in consultation and management planning, raising the following concerns regarding a lack of consultation with Fish and Game:</p> <ul style="list-style-type: none"> • Questions if the NPS-FM process has been followed correctly, particularly Section 3. 2 (b). • A lack of communication with Fish and Game has led to the omission of acknowledging the requirement to protect habitat for trout and salmon insofar as this is consistent with protections of the habitats of indigenous freshwater species (Policies 10 and Policies 9 of the NPS-FM). Fish and Game further note that Appendix 1B requires that where FMUs or parts thereof have fishing values, attributes associated with this fishing value (for both indigenous and introduced freshwater fish) need to be specifically targeted to allow the numbers of fish to be sufficient and suitable for human consumption. Fish and Game raises concern that limited engagement potentially circumvents important aspects of NPS-FM and allows for Plan to continue to not fulfil national level legislative obligations for freshwater health in key areas. <p>UHCC [S225.004] (supported by WCC [FS36.035], opposed by Forest & Bird [FS23.832]) seeks further work and consultation is undertaken in partnership with territorial authorities to accurately reflect roles and function in achieving outcomes and aspirations of Whaitua documents.</p> <p>Water NZ [S246.012] seeks for GWRC to consult with Taumata Arowai on any proposed measures to ensure consistency in requirements (noting the requirements in Schedule 32 as an example), noting new mandatory requirements introduced in the Water Services Act 2021. Water NZ [S246.016] also seeks for further engagement to be undertaken with utility operators to ensure what is proposed in plans is workable.</p>
Suggestion for collaborative and participatory approaches	Simon Wright [S99.003], Eugene Doyle [S178.005 and S178.006] and Generation Zero [S221.009] suggest the use of collaborative and participatory approaches with local community members.

Issue 5: Alignment with national direction

Sub-issue(s)	Description of matters raised by submitters
Uncertainty of new government direction	<p>69 submitters note the implications of new national government direction on PC1. These are summarised below.</p> <p>Lousie Askin [S9.005] notes that the effectiveness of WIP recommendations may be impacted by new Government direction.</p> <p>WWL [S151.015]²⁶ seeks all changes to PC1 that are necessary to give effect to changes to the NPS-FM, should such changes be progressed during consideration of PC1.</p> <p>Parkvale Road Limited [S236.004] and Peka Peka Farm [S251.003] raise concerns with PC1 being out of step with higher order policy direction, given the expected replacement of the NPS-FM. Similarly, NZFFA Wellington [S36.002] considers the plan change must maintain consistency with revised objectives following review of the NPS-FM.</p> <p>Akatarawa Valley Residents²⁷ and Megan Persico [S214.002] seek for the PC1 process to be stopped, given new government direction to repeal the NPS-FM and to repeal RMA reform. Similarly, Sally Kean [S57.004] opposes any decisions being made by GWRC until the RMA has been revamped, and Karen Pearce [S232.001] seeks for PC1 to be stopped due to the change in government.</p>

[S140.001 and S140.003], George Hare [S141.001 and S141.003], Paul Arnold [S142.001 and S142.003], Chilly Brook Trust (Mary Redington) [S143.001 and S143.003], Gaylene Ward & Mike Ward [S144.001 and S144.003], Nigel Parry & Judy Parry [S145.001 and S145.003], Leanna Jackson & Carl Burns [S146.001 and S146.003], Joline Fowke & Owen Fowke [S147.001 and S147.003], Paul Baker [S148.001 and S148.003], Allan MacDonald [S149.001 and S149.003], Phyllis Strachan [S150.001 and S150.003], John Raffan & Heather Raffan [S152.001 and S152.003], Redington Family Trust (Mary Redington) [S153.001 and S153.003], Ash Barker & Kes Barker [S154.001 and S154.003], Susan Davidson [S155.001 and S155.003], John Bryce [S156.001 and S156.003], Dr Patricia Laing [S157.001 and S157.003], Erica Dawson [S158.001 and S158.003], Bruce Stevens & Theresa Stevens [S159.001 and S159.003], Dr Harold Cuffe [S160.001 and S160.003], Phil Kirycuk [S162.001 and S162.003], John Simister [S163.001 and S163.003], Sarah Purdy [S164.001 and S164.003], Dr Anna De Raadt & Roger Fairclough [S166.001 and S166.003], Allan and Sarah Kelly [S167.001 and S167.003], Barry Hearfield & Carol McGhie [S168.001 and S168.003], Karina Fraser & Grant Fraser [S170.001 and S170.003], Jessica Perno & Gavin Perno [S171.001 and S171.003], Thomas Davies [S172.001 and S172.003], Pam Ritchie [S174.001 and S174.003]

²⁵ [S188.004] (supported by Forest & Bird [FS23.1160], MPGC [FS21.009] and MPHRCI [FS27.1093], opposed by NZFFA [FS9.004]), [S188.016] (supported by Forest & Bird [FS23.1172], Hort NZ [FS1.001], MPGC [FS21.021] and MPHRCI [FS27.1105], opposed by NZFFA [FS9.016]) and [S188.017] (supported by Forest & Bird [FS23.1173], MPGC [FS21.022] and MPHRCI [FS27.1106], opposed by NZFFA [FS9.017])

²⁶ supported by NZTA [FS28.131] and Kāinga Ora [FS45.076], opposed by Forest & Bird [FS23.1342]

²⁷ John Van Nortwick & Jill Van Nortwick [S120.002], Karen Wallace & Mark Robbins [S121.002], Paul Lambert & Steph Lambert [S122.002], Sandy Cooper [S123.002], Fredrick Steensma [S124.002], Shoshanah (Shosh) Phillips [S125.002], Russell Judd & Cecile Judd [S126.002], Johanna Overdiep & Steve Sturgess [S127.002], Joany Grima & Allen Rockell [S128.002], Keith Budd & Liz Budd [S129.002], Pete Clark [S130.002], Gillian Taylor & Chris Taylor [S131.002], Hannah Dawson & Ryan

Sub-issue(s)	Description of matters raised by submitters
	<p>The Maymorn Collective²⁸, John Boyle [S181.007] and Susan Boyle [S182.007] seek the revision of any decision that prohibits the ability to unlock housing, citing the new government’s intention to “unlock land for housing”.</p> <p>In light of evolving national direction, UHCC [S225.002]²⁹ seeks that a full legal and natural justice review of the provisions is undertaken. Furthermore, UHCC [S225.003]³⁰ seeks the amendment or removal of actions which conflict with (or are more onerous than) direction from the new government.</p>
Alignment with existing legislation	<p>Bob Curry [S53.002] seeks that PC1 is not implemented until government review of NPSs has been completed, considering there is conflict and inconsistency between the implementation of the NPS-HPL by UHCC and the NPS-FM by GWRC.</p> <p>Upper Hutt Rural Communities³¹; Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.004] and M. Garcia [S287.004] consider the NPS-FM has been prioritised pre-eminently over other NPSs, and seek for equal weighting to be given to all government legislation and to disregard “regulation by committee”.</p> <p>UHCC [S225.007] (supported by Gillies [FS11.004]; Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.005] and Pukerua Holdings [FS30.004], opposed by Forest & Bird [FS23.835]) seek the deletion or amendment of provisions which lack higher order document direction or evidentiary support.</p> <p>Parkvale Road Limited [S236.002] considers the approach for PC1 is contrary to the directive of the NPS-UD. Similarly, Best Farm & Others [S254.002] (with a neutral/not stated stance from Woodridge [FS16.010]) considers that insufficient consideration has been given to the NPS-UD.</p> <p>Transpower [S177.001] (opposed by Forest & Bird [FS23.744]) seeks for the objective of the NPS-ET to be given effect to through the provisions of PC1 while also giving effect to the NPS-FM.</p> <p>Water NZ [S246.007] notes the NRP must be consistent with the Water Services Entities Act 2022 (section 253) provisions for a transport corridor manager that owns or operates a transport stormwater system.</p> <p>Isabella Cawthorn [S249.009] seeks that the duplication of legislation (specifically, the Water Services Entities Act 2022, RMA, Spatial Planning Act and Natural Built Environments Act) is avoided.</p> <p>Taumata Arowai [S116.001] (supported by Forest & Bird [FS23.569], opposed by WWL [FS39.192]) seeks for existing terminology not proposed to be amended in PC1 (including: bore, community drinking water supply, drain, greywater, group drinking water supply, health needs of people, sludge, wastewater, wastewater network, water sensitive urban design) are aligned as possible and appropriate with the National Planning Standards, the WSA and policy developed by Taumata Arowai.</p>

Dawson [S132.002], Len Drabble [S133.002], Graeme Allan [S134.002], Joshua Wood [S135.002], Micayla Wood [S136.002], Jonathan Wood [S137.002], Tony Wood & Helen Wood [S138.002], Glenda Arnold [S139.002], Janet Collins [S140.002], George Hare [S141.002], Paul Arnold [S142.002], Chilly Brook Trust (Mary Redington) [S143.002], Gaylene Ward & Mike Ward [S144.002], Nigel Parry & Judy Parry [S145.002], Leanna Jackson & Carl Burns [S146.002], Joline Fowke & Owen Fowke [S147.002], Paul Baker [S148.002], Allan MacDonald [S149.002], Phyllis Strachan [S150.002], John Raffan & Heather Raffan [S152.002], Redington Family Trust (Mary Redington) [S153.002], Ash Barker & Kes Barker [S154.002], Susan Davidson [S155.002], John Bryce [S156.002], Dr Patricia Laing [S157.002], Erica Dawson [S158.002], Bruce Stevens & Theresa Stevens [S159.002], Dr Harold Cuffe [S160.002], Phil Kirycuk [S162.002], John Simister [S163.002], Sarah Purdy [S164.002], Dr Anna De Raadt & Roger Fairclough [S166.002], Allan and Sarah Kelly [S167.002], Barry Hearfield & Carol McGhie [S168.002], Karina Fraser & Grant Fraser [S170.002], Jessica Perno & Gavin Perno [S171.002], Thomas Davies [S172.002], Pam Ritchie [S174.002]

²⁸ Amanda and Rami Mounla - Marita Manns Trustee Limited [S265.005], Tamara Hrstich [S266.005], Marluk Agistments Ltd - Richard and Lynn Bialy [S267.005], Bruce Bates and Kim Cheeseman [S268.005], Paul and Megan Persico [S269.005], Dean and Michelle Spicer and Benjamin Shaw (as Trustees for Bridgewater Trust) [S270.005], John and Susan Boyle [S271.005], Philip and Teresa Eales [S272.005]

²⁹ supported by Gillies [FS11.001] and Pukerua Holdings [FS30.001], opposed by Forest & Bird [FS23.830]

³⁰ supported by Gillies [FS11.002] and Pukerua Holdings [FS30.002], opposed by Forest and Bird [FS23.831]

³¹ Robert Anker [S59.004] (opposed by MPHRCI [FS27.1253]), Darren Pettengell [S60.004] (opposed by MPHRCI [FS27.1331]), Lenard Drabble [S61.004] (opposed by MPHRCI [FS27.1500]), Jacqui Thompson [S62.004] (opposed by MPHRCI [FS27.1396]), Callum Graeme Ritchie Forbes [S63.004] (opposed by MPHRCI [FS27.1305]), Linda Forbes Williamson [S64.004] (opposed by MPHRCI [FS27.1513]), Darren Pettengell [S65.004] (opposed by MPHRCI [FS27.1591]), Jon-Luke Clarke Harvey [S66.004] (opposed by MPHRCI [FS27.1461]), Darren Pettengell [S67.004] (opposed by MPHRCI [FS27.1565]), Gail Thomson [S68.004] (opposed by MPHRCI [FS27.1357]), Susan Patricia Boyle [S69.004] (opposed by MPHRCI [FS27.1617]), John Peter Boyle [S70.004] (opposed by MPHRCI [FS27.1448]), Brendon Allen Greig [S71.004] (opposed by MPHRCI [FS27.1279]), Angela Marie Greig [S72.004] (opposed by MPHRCI [FS27.1266]), Philip Eales [S73.004] (opposed by MPHRCI [FS27.1578]), Teresa Eales [S74.004] (opposed by MPHRCI [FS27.1630]), Lynn Marion Bialy [S75.004] (opposed by MPHRCI [FS27.1526]), Richard Charles Bialy [S76.004] (opposed by MPHRCI [FS27.1604]), JoAnn McCready [S77.004] (opposed by MPHRCI [FS27.1435]), Bob Curry [S78.004] (opposed by MPHRCI [FS27.1240]), Bob McLellan [S79.004] (opposed by MPHRCI [FS27.1227]), Bridget M Myles [S80.004] (opposed by MPHRCI [FS27.1292]), David McCready [S81.004] (opposed by MPHRCI [FS27.1344]), Meaghan Fitzgerald [S82.004] (opposed by MPHRCI [FS27.1539]), Kevin Nash [S83.004] (opposed by MPHRCI [FS27.1487]), Karen Nash [S84.004] (opposed by MPHRCI [FS27.1474]), Jennifer Sparrow [S86.004] (opposed by MPHRCI [FS27.1409]), Grant Munro [S87.004] (opposed by MPHRCI [FS27.1383]), Colleen Munro [S88.004] (opposed by MPHRCI [FS27.1318]), Joan Elizabeth Hutson [S89.004] (opposed by MPHRCI [FS27.1422]), Peter Jeffery Hutson [S90.004] (opposed by MPHRCI [FS27.1552]), Graeme Shellard [S91.004] (opposed by MPHRCI [FS27.1370])

Issue 6: Alignment with the RPS

Sub-issue(s)	Description of matters raised by submitters
Alignment with RPS	<p>WIAL [S101.008] (opposed by Forest & Bird [FS23.1261]) seeks any hearings to be postponed until decisions on the Proposed RPS are issued and appeals are resolved.</p> <p>Transpower [S177.002] (opposed by Forest & Bird [FS23.745] and supported by WIAL [FS31.098]) seeks higher order direction on RSI (from the RPS) be provided for.</p> <p>The Shellards [S202.003] seek information on Plan Change 2 of the RPS / further changes to the NRP to be shared due to its potential impact on PC1 of the NRP.</p>

Issue 7: Consistency with WIP recommendations

Sub-issue(s)	Description of matters raised by submitters
Consistency with WIP recommendations	<p>Lynn Cadenhead [S22.004], Neil Deans [S29.001] and Friends of Waipāhihi Karori Stream [S107.010] support the whitua processes and the implementation of recommendations made by whitua committee members. Mary Hutchinson [S115.001] and Porirua Harbour Trust & Guardians of Pāuatahanui Inlet [S176.001] also support the whitua processes, and further seek that PC1 is integrated with the related functions and initiatives of other statutory authorities.</p> <p>Louise Askin [S9.002 and S9.003] raises concerns that the detail of PC1 is very different to the WIP and the partnership approach recommended in the WIP has not continued into PC1.</p> <p>Southern North Island Wood Council [S262.002] (supported by NZCF [FS50.135]) considers PC1 is inconsistent with the whitua committee recommendations and is too onerous. Dougal Morrison [S3.004] also raises concern that the proposed changes go beyond the WIP recommendations.</p>

Issue 8: Costs and benefits

Sub-issue(s)	Description of matters raised by submitters
Sufficiency of costs/benefits analysis	<p>35 submitters raise concerns regarding the sufficiency of the cost/benefit analysis undertaken for PC1. These are summarised below.</p> <p>Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.011]; M. Garcia [S287.013]; and Jo McCready [S94.007] share concerns that costs and benefits have not been quantified and seek a thorough cost-benefit exercise be undertaken. Upper Hutt Rural Communities³² consider the Section 32 analysis does not adequately quantify the economic, environmental and cultural costs and benefits, and also seek a cost-benefit exercise to be undertaken.</p>
General	<p>Six submitters³³ acknowledge the potential financial costs associated with the improvement of water but consider these costs should not be deferred to the future.</p> <p>Pāuatahanui Residents Association [S16.004], Christine Stanley [S26.005], Jo McCready [S94.004] and Paul Persico [S215.001] share concerns with the potential costs of implementing PC1 on landowners.</p> <p>Pikarere Farm [S199.003] considers cost is an important factor and should be given proper consideration.</p> <p>Civil Contractors NZ [S285.001]³⁴ considers PC1 will have significant impacts on the civil construction industry.</p>

³² Bob Anker [S59.008] (with a neutral/not stated stance from Woodridge Holdings [FS16.020], opposed by MPHRCI [FS27.1257]), Darren Pettengell [S60.008] (opposed by MPHRCI [FS27.1335]), Lenard Drabble [S61.008] (opposed by MPHRCI [FS27.1504]), Jacqui Thompson [S62.008] (opposed by MPHRCI [FS27.1400]), Callum Graeme Ritchie Forbes [S63.008] (opposed by MPHRCI [FS27.1309]), Linda Forbes Williamson [S64.008] (opposed by MPHRCI [FS27.1517]), Darren Pettengell [S65.008] (opposed by MPHRCI [FS27.1595]), Jon-Luke Clarke Harvey [S66.008] (opposed by MPHRCI [FS27.1465]), Darren Pettengell [S67.008] (opposed by MPHRCI [FS27.1569]), Gail Thomson [S68.008] (opposed by MPHRCI [FS27.1361]), Susan Patricia Boyle [S69.008] (opposed by MPHRCI [FS27.1621]), John Peter Boyle [S70.008] (opposed by MPHRCI [FS27.1452]), Brendon Allen Greig [S71.008] (opposed by MPHRCI [FS27.1283]), Angela Marie Greig [S72.008] (opposed by MPHRCI [FS27.1270]), Philip Eales [S73.008] (opposed by MPHRCI [FS27.1582]), Teresa Eales [S74.008] (opposed by MPHRCI [FS27.1634]), Lynn Marion Bialy [S75.008] (opposed by MPHRCI [FS27.1530]), Richard Charles Bialy [S76.008] (opposed by MPHRCI [FS27.1608]), JoAnn McCready [S77.008] (opposed by MPHRCI [FS27.1439]), Bob Curry [S78.008] (opposed by MPHRCI [FS27.1244]), Bob McLellan [S79.008] (opposed by MPHRCI [FS27.1231]), Bridget M Myles [S80.008] (opposed by MPHRCI [FS27.1296]), David McCready [S81.008] (opposed by MPHRCI [FS27.1348]), Meaghan Fitzgerald [S82.008] (opposed by MPHRCI [FS27.1543]), Kevin Nash [S83.008] (opposed by MPHRCI [FS27.1491]), Karen Nash [S84.008] (opposed by MPHRCI [FS27.1478]), Jennifer Sparrow [S86.008] (opposed by MPHRCI [FS27.1413]), Grant Munro [S87.008] (opposed by MPHRCI [FS27.1387]), Colleen Munro [S88.008] (opposed by MPHRCI [FS27.1322]), Joan Elizabeth Hutson [S89.008] (opposed by MPHRCI [FS27.1426]), Peter Jeffery Hutson [S90.008] (opposed by MPHRCI [FS27.1556]), Graeme Shellard [S91.008] (opposed by MPHRCI [FS27.1374])

³³ Lynn Cadenhead [S22.010], Jonny Osborne [S28.005], Amos Mann [S35.005], Friends of Waipāhihi Karori Stream [S107.008], Anya Pollock [S242.004] and Isabella Cawthorn [S249.012 and S249.014]

³⁴ supported by Goodman Contractors [FS35.001], PCL Contracting [FS32.001], Orogen Limited [FS34.012] and Multi Civil Contractors [FS49.001]

Issue 9: Plan clarity/accessibility

Sub-issue(s)	Description of matters raised by submitters
Plan clarity/accessibility	<p>Wayne Robert Pettersson and Maureen Pettersson [S118.001] consider the language is difficult to understand. David and Pauline Innes [S234.001] and Craig Innes [S277.001] also note difficulty in reading the plan, further noting that the maps are unclear and that the connection between policies and geographic areas is inadequate. Heather Phillips [S212.001 and S212.011] considers the plan is incomplete and not easily understood, consequently undermining its effectiveness.</p> <p>Gillies [S161.002] and Arakura Plains [S173.002] note that there are drafting errors in PC1, resulting in unintended consequences for housing and land development due to the provisions having immediate legal effect.</p> <p>Three submitters seek particular relief to improve general clarity of the plan. John Hill [S34.001] seeks for all legislation or direction to be clear and precise. Woodridge [S255.003] seeks for the review or removal of all vague language, citing the use of “where practicable” as an example. UHCC [S225.022] considers the use of “and/or” inappropriate and seeks clarification on whether it is inclusive. UHCC [S225.006]³⁵ seeks for PC1 to be amended to implement the National Planning Standards. Other submitters note ambiguity and inconsistency in the plan’s definitions and provisions:</p> <ul style="list-style-type: none"> • Fulton Hogan [S43.001] seeks consistency in definitions and plan provisions. • NZFFA [S195.003] (opposed by Forest & Bird [FS23.406]) seek for more terms to be defined to avoid ambiguity, and additionally to have English translations of Māori words (or an English version of the plan). • In separate submission points, UHCC³⁶ seeks the deletion or amendment of definitions and policies where they lack clarity, and where they read as rules or conditions of consent. <p>Christine Stanley [S26.007] and PCC [S240.008]³⁷ seek for the plan to be provided in ePlan format to improve efficiency and cost savings.</p> <p>WIAL [S101.009] (opposed by Forest & Bird [FS23.1262]) requests a tracked change version of the plan be issued, prior to the preparation of s42A reports and evidence to ensure that it is clear which provisions are changing, where and how they sit within the wider context of the Operative NRP, including, as anticipated by the New Zealand Planning Standards, appropriate links to cross reference rules or provisions, or other documents. WIAL also seeks reformatting of the plan to provide appropriate links and a contents page.</p> <p>Ara Poutama [S248.001] supports the note under 8.2 Policies and seeks for it to be retained as notified, as it provides for existing operative policies to continue to apply within the whitua, including those that recognise the beneficial use and development of RSI. Similarly, Transpower³⁸ supports the notes under 8.2 Policies and 9.2 Policies as notified, due to providing a range of existing operative policies to continue to apply within the whitua.</p> <p>Furthermore, Transpower³⁹ seeks for the following passage referencing the NES-ETA to be inserted into the interpretation section of Chapters 8.3 and 9.3 to assist plan users in interpreting differences between standards and activity statuses:</p> <p style="text-align: center;"><i>Many activities relating to the operation, maintenance, upgrading, relocation or removal of an electricity transmission line and ancillary structures that existed prior to 14 January 2010 are controlled by the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA), separate to this Plan. Where the provisions of this Plan conflict with the requirements of the NESETA, the provisions of the NESETA apply.</i></p> <p>Forest & Bird [S261.001] (opposed by NZFFA [FS9.328] and supported by MPHRCI [FS27.620]) seek for definitions which cross-reference to other legislation to be amended to the actual text of those definitions for ease of use.</p> <p>In two submission points, Heather Blissett [S45.001 and S45.002] seeks the following relief:</p> <ul style="list-style-type: none"> • For the word “resource” to be changed to “taonga” as the term resource implies something to be used as people see fit for financial gain. • “Mauri” be added to restoring statements to reflect restoring the mauri of the water.

³⁵ supported by Hort NZ [FS1.002]; Gillies [FS11.003]; Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.004]; Pukerua Holdings [FS30.003] and opposed by Forest & Bird [FS23.834]

³⁶ [S225.010] (opposed by Forest & Bird [FS23.838]) and [S225.011] (opposed by Forest & Bird [FS23.839] and supported by WWL [FS39.209])

³⁷ with a neutral/not stated stance from Woodridge Holdings [FS16.038], opposed by NZFFA [FS9.105], and supported by WCC [FS36.012]

³⁸ [S177.019] (opposed by Forest & Bird [FS23.762]) and [S177.045] (opposed by Forest & Bird [FS23.788])

³⁹ [S177.028] (opposed by Forest & Bird [FS23.771]) and [S177.054] (opposed by Forest & Bird [FS23.797])

Sub-issue(s)	Description of matters raised by submitters
	<p>In three submission points, UHCC seeks the following relief:</p> <ul style="list-style-type: none"> • deletion of onerous requirements for existing consents [S225.009]⁴⁰ • deletion of references to “Wellington Water” and instead refer to “water entities” [S225.021] (supported by WCC [FS36.039], opposed by Forest & Bird [FS23.849]) <p>Water NZ [S246.039] notes an error in numbering wherein Clause 6.16 should be renumbered to 6.18.</p>

Issue 10: Regulatory approach

Sub-issue(s)	Description of matters raised by submitters
Regulatory approach	<p>John Easther [S17.017] considers PC1 must be amended to include statutory provisions for central and local government funding for retirement of land, land use changes, certification costs and mitigation measures required to meet objectives.</p> <p>Fulton Hogan [S43.002], Sally Kean [S57.003 and S57.007], John Coveney [S179.001] and Kirsty Gill [S281.001] raise general concerns that overregulation is occurring and that there will be excessive restrictions on landowners. Several submitters⁴¹ oppose taking a broadbrush regulatory approach and the use of blanket rules. Terawhiti Farming [S224.005] (supported in part by Meridian [FS47.023]), Te Kamaru Station [S229.005] (supported in part by Meridian [FS47.028]) and Te Marama Ltd [S231.002 and S231.006] specifically seek that that an approach is taken on partnering with communities rather than on blanket rules modelling and enforcement, while Mākara and Ohariu large farms [S51.003] (supported by Diane Strugnell [FS12.2]) seeks the removal of PC1’s regulatory approach entirely. WMNZ [S256.001] (opposed by MPHRCI [FS27.1045]) considers PC1 goes beyond the control of land for the purpose of maintaining the quantity and quality of water bodies and coastal waters, and steps into strategic planning and controlling the location of land use development.</p> <p>Louise Askin [S9.006] seeks that non-regulatory measures are given equal priority in PC1 and applied in areas where regulation will be most prominent.</p> <p>Te Awarua o Porirua Harbour Trust & Guardians of Pāuatahanui Inlet [S176.006] seek for the inclusion of a method for community engagement to ensure updates on progress of implementation are carried out and to ensure actions are not deferred on the basis of economic affordability or feasibility.</p> <p>WFF [S193.006] (opposed by Forest & Bird [FS23.962]) supports an integrated catchment approach to the management of sediment and nutrient loss being underpinned by non-regulatory methods such as FAPs and Regional Forest Spatial Plan.</p> <p>Winstone Aggregates [S206.015] opposes the use of prohibited activity status and seeks further consideration to the activity statuses proposed, and whether proportionate evaluation has been given, noting the following:</p> <ul style="list-style-type: none"> • 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 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. <p>PCC [S240.004] (opposed by NZFFA [FS9.101], with a neutral/not stated stance from Woodridge [FS16.032]) also opposes the use of prohibited activity status and considers that careful consideration should be given to its use, particularly when considering the tensions that exist between NPSs for freshwater and urban development (noting that the NPS-UD requires consideration be given to out of</p>

⁴⁰ supported by Gillies [FS11.006], Pukerua Holdings [FS30.006] and WWL [FS39.208], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.012] and R P Mansell; A J Mansell, & M R Mansell [FS26.004], opposed by Forest & Bird [FS23.837]

⁴¹ Terawhiti Farming [S224.001] (supported in part by Meridian [FS47.019]), Te Kamaru Station [S229.001] (supported in part by Meridian [FS47.024]), Alex Pfeffer [S278.001], Kirsty Gill [S281.006] and Peter Handford [S280.001] (supported by NZCF [FS50.114])

Sub-issue(s)	Description of matters raised by submitters
	<p>sequence urban development). PCC considers there is insufficient evidence to support the approach taken, especially considering the prohibited activity status approach, noting that the definition and associated provisions may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have positive outcomes, including positive outcomes for freshwater.</p> <p>UHCC [S225.008]⁴² seeks the deletion or amendment of provisions which lack consideration of scale and significance, and which apply to all development without appropriate thresholds.</p>

Issue 11: Implementation/enforcement

Sub-issue(s)	Description of matters raised by submitters
Implementation/enforcement	<p>Pāuatahanui Residents Association [S16.005] raises concerns that poor implementation could penalise those using good management practices while failing to identify those engaging in poor management practices.</p> <p>Jo McCready [S94.005] raises concern that a lack of information on support resourcing, including monitoring the implementation of PC1, means it is likely to penalise those engaging proactively and using good management practices while failing to identify or deal with those engaging in poor management practices.</p> <p>Wayne Robert Pettersson and Maureen Pettersson [S118.006] seek financial assistance from GWRC in relation to PC1 requirements.</p> <p>Water NZ [S246.013] notes inconsistencies in the consent and compliance process across consent authorities increases regulatory burden and seeks for such inconsistencies to be avoided. In another submission point, Water NZ [S246.014] emphasises the necessity of Council to enforce rules and plans. Simon Wright [S99.002] also highlights the importance of compliance and monitoring, noting that this needs to be resourced adequately. Similar expectations for the resourcing of implementation are raised by Porirua Harbour Trust & Guardians of Pāuatahanui Inlet [S176.008] (supported by Diane Strugnell [FS12.6]). Amos Mann [S35.006] and Pamela Govan [S40.005] also encourage the resourcing of enforcement, as well as policy tools and ongoing engagement.</p> <p>UHCC [S225.013] (supported by WCC [FS36.036], opposed by Forest & Bird [FS23.841]) seeks that the timeframes of the NRP are amended to give reasonable timeframes to implement new direction for landowners, ensure these are reasonable and achievable and where practicable, funded from external sources.</p>

Issue 12: Robustness of evidence

Sub-issue(s)	Description of matters raised by submitters
Robustness of evidence	<p>John Easther [S17.031] considers land use changes that address run-off and reduction of flood peaks in the Makara/Ohariu catchments will also reduce silt loads, and raises concern that PC1's focus on grade and cover of land (and not reducing flood flows) will not reduce transportation of silt.</p> <p>Upper Hutt Rural Communities⁴³; Callum Forbes [S92.003]; John and Jacqueline Diggins [S250.004]; Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.003]; and M. Garcia [S287.003] seek for clauses to be removed where there are insufficient water quality monitoring sites.</p> <p>Wayne Robert Pettersson and Maureen Pettersson [S118.003] considers the problems addressed by PC1 are the result of large intensive farming and logging operations rather than small blocks.</p>

⁴² supported by Gillies [FS11.005] and Pukerua Holdings [FS30.005], opposed by Forest & Bird [FS23.836]

⁴³ Bob Anker [S59.003] (opposed by MPHRCI [FS27.1252]), Darren Pettengell [S60.003] (opposed by MPHRCI [FS27.1330]), Lenard Drabble [S61.003] (opposed by MPHRCI [FS27.1499]), Jacqui Thompson [S62.003] (opposed by MPHRCI [FS27.1395]), Callum Graeme Ritchie Forbes [S63.003] (opposed by MPHRCI [FS27.1304]), Linda Forbes Williamson [S64.003] (opposed by MPHRCI [FS27.1512]), Darren Pettengell [S65.003] (opposed by MPHRCI [FS27.1590]), Jon-Luke Clarke Harvey [S66.003] (opposed by MPHRCI [FS27.1460]), Darren Pettengell [S67.003] (opposed by MPHRCI [FS27.1564]), Gail Thomson [S68.003] (opposed by MPHRCI [FS27.1356]), Susan Patricia Boyle [S69.003] (opposed by MPHRCI [FS27.1616]), John Peter Boyle [S70.003] (opposed by MPHRCI [FS27.1447]), Brendon Allen Greig [S71.003] (opposed by MPHRCI [FS27.1278]), Angela Marie Greig [S72.003] (opposed by MPHRCI [FS27.1265]), Philip Eales [S73.003] (opposed by MPHRCI [FS27.1577]), Teresa Eales [S74.003] (opposed by MPHRCI [FS27.1629]), Lynn Marion Bialy [S75.003] (opposed by MPHRCI [FS27.1525]), Richard Charles Bialy [S76.003] (opposed by MPHRCI [FS27.1603]), JoAnn McCready [S77.003] (opposed by MPHRCI [FS27.1434]), Bob Curry [S78.003] (opposed by MPHRCI [FS27.1239]), Bob McLellan [S79.003] (opposed by MPHRCI [FS27.1226]), Bridget M Myles [S80.003] (opposed by MPHRCI [FS27.1291]), David McCready [S81.003] (opposed by MPHRCI [FS27.1343]), Meaghan Fitzgerald [S82.003] (opposed by MPHRCI [FS27.1538]), Kevin Nash [S83.003] (opposed by MPHRCI [FS27.1486]), Karen Nash [S84.003] (opposed by MPHRCI [FS27.1473]), Jennifer Sparrow [S86.003] (opposed by MPHRCI [FS27.1408]), Grant Munro [S87.003] (opposed by MPHRCI [FS27.1382]), Colleen Munro [S88.003] (opposed by MPHRCI [FS27.1317]), Joan Elizabeth Hutson [S89.003] (opposed by MPHRCI [FS27.1421]), Peter Jeffery Hutson [S90.003] (opposed by MPHRCI [FS27.1551]), Graeme Shellard [S91.003] (opposed by MPHRCI [FS27.1369])

Sub-issue(s)	Description of matters raised by submitters
	John and Jacqueline Diggins [S250.001] question the data GWRC is relying on. More specifically, Pauatahanui Residents Association [S16.003], Jo McCready [S94.003] and WFF [S193.002] (opposed by Forest & Bird [FS23.958]) raise concerns regarding the adequacy of modelling to inform policies rather than collecting ground-truthed data.

Issue 13: Transparency

Sub-issue(s)	Description of matters raised by submitters
Transparency	<p>Upper Hutt Rural Communities⁴⁴, Callum Forbes [S92.002], Michael Marfell-Jones [S114.002], Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.002] and M. Garcia [S287.002] consider PC1 lacks supporting evidence and that the rules were developed to circumvent recent Environment Court decisions, and seek the removal of clauses that are demonstrably “regulating by fiat”.</p> <p>In two submission points, John Hill [S34.002 and S34.003] seeks the following:</p> <ul style="list-style-type: none"> • That PC1 is not misinterpreted or used to support the ideology of any member or group within GWRC • Access to a commissioner to manage misuse or interpretation of rules

Issue 14: Not applicable to whitua and submissions on provisions not included in PC1

Sub-issue(s)	Description of matters raised by submitters
General/overarching	<p>Support contact recreation objectives Water NZ [S246.019] supports the inclusion of tables listing quantifiable measures for contact recreation, Māori customary use, aquatic ecosystem health and mahinga kai objectives to Chapter 3 (Objectives). Water NZ considers including numerical values for macrophytes, periphyton, biomass, invertebrate, fish and mahinga kai species in rivers, streams and lakes is a smart way of demonstrating achievement of the first priority of Te Mana o te Wai.</p> <p>Amend Objectives O6 and O9 WWL [S151.183 and S151.033]⁴⁵ (supported in part by Transpower [FS20.092], opposed by Forest & Bird [FS23.1510]) suggests relief in relation to Objectives O6 and O9 of the Operative NRP to ensure that the NRP gives effect to aspects of national and regional policy direction, and for consistency with Objective O10 of the NRP, specifically in relation to wastewater infrastructure:</p> <ul style="list-style-type: none"> • Amend Objective O9 as follows: <ul style="list-style-type: none"> <i>The social, economic, cultural and environmental benefits of Regionally Significant Infrastructure, renewable energy generation activities and the utilisation of mineral resources are recognized and provided for.</i> • Reinstate and alter Objective O6 as follows: <ul style="list-style-type: none"> <i>The social, economic, cultural and environmental benefits of:</i> <ul style="list-style-type: none"> ○ <i>taking and using water are recognized</i> ○ <i>managing stormwater for the safety of people and property</i> ○ <i>disposing of wastewater to achieve public health outcomes are recognized and provided for when managing water.</i>

⁴⁴ Bob Anker [S59.002] (opposed by MPHRCI [FS27.1251]), Darren Pettengell [S60.002] (opposed by MPHRCI [FS27.1329]), Lenard Drabble [S61.002] (opposed by MPHRCI [FS27.1498]), Jacqui Thompson [S62.002] (opposed by MPHRCI [FS27.1394]), Callum Graeme Ritchie Forbes [S63.002] (opposed by MPHRCI [FS27.1303]), Linda Forbes Williamson [S64.002] (opposed by MPHRCI [FS27.1511]), Darren Pettengell [S65.002] (opposed by MPHRCI [FS27.1589]), Jon-Luke Clarke Harvey [S66.002] (opposed by MPHRCI [FS27.1459]), Darren Pettengell [S67.002] (opposed by MPHRCI [FS27.1563]), Gail Thomson [S68.002] (opposed by MPHRCI [FS27.1355]), Susan Patricia Boyle [S69.002] (opposed by MPHRCI [FS27.1615]), John Peter Boyle [S70.002] (opposed by MPHRCI [FS27.1446]), Brendon Allen Greig [S71.002] (opposed by MPHRCI [FS27.1277]), Angela Marie Greig [S72.002] (opposed by MPHRCI [FS27.1264]), Philip Eales [S73.002] (opposed by MPHRCI [FS27.1576]), Teresa Eales [S74.002] (opposed by MPHRCI [FS27.1628]), Lynn Marion Bialy [S75.002] (opposed by MPHRCI [FS27.1524]), Richard Charles Bialy [S76.002] (opposed by MPHRCI [FS27.1602]), JoAnn McCready [S77.002] (opposed by MPHRCI [FS27.1433]), Bob Curry [S78.002] (opposed by MPHRCI [FS27.1238]), Bob McLellan [S79.002] (opposed by MPHRCI [FS27.1225]), Bridget M Myles [S80.002] (opposed by MPHRCI [FS27.1290]), David McCready [S81.002] (opposed by MPHRCI [FS27.1342]), Meaghan Fitzgerald [S82.002] (opposed by MPHRCI [FS27.1537]), Kevin Nash [S83.002] (opposed by MPHRCI [FS27.1485]), Karen Nash [S84.002] (opposed by MPHRCI [FS27.1472]), Jennifer Sparrow [S86.002] (opposed by MPHRCI [FS27.1407]), Grant Munro [S87.002] (opposed by MPHRCI [FS27.1381]), Colleen Munro [S88.002] (opposed by MPHRCI [FS27.1316]), Joan Elizabeth Hutson [S89.002] (opposed by MPHRCI [FS27.1420]), Peter Jeffery Hutson [S90.002] (opposed by MPHRCI [FS27.1550]), Graeme Shellard [S91.002] (opposed by MPHRCI [FS27.1368]).

⁴⁵ supported in part by Meridian [FS47.136], supported in part by Winstone Aggregates [FS8.039], opposed by Forest & Bird [FS23.1360]

Sub-issue(s)	Description of matters raised by submitters
	<p>General Support Water NZ [S246.020, S246.021 and S246.022] expresses support for listing the types of water bodies and the activities they are suitable for in Objective O18, O19 and O25 with no specific relief sought.</p>
Objective O2	<p>Encourage improvement in water quality rather than require Woodridge [S255.017] notes that while positive effects can be used to offset negative adverse effects and recognises the provision for financial contributions under s108(10), however considers there is no requirement for the effects of a development on the environment to be positive. Woodridge seeks for all objectives, policies and rules to be reviewed and rewritten such that it is clear that improvements in water quality are encouraged but not required.</p>
Objective O19	<p>Provide for government support Diane Strugnell [S5.001] seeks amendments for Clause (c), noting concern that encouragement is required where there is not clear advisory and financial support:</p> <p style="text-align: center;"><i>(c) restoration of aquatic ecosystem health and mahinga kai is encouraged <u>with appropriate support from central and regional government.</u></i></p> <p>Require improvement and restoration of biodiversity and bring forward timeframe Lynn Cadenhead [S22.011], Yvonne Weeber [S183.070] (supported by MPHRCI [FS27.070]) and Guardians of the Bays [S186.029] (supported by MPHRCI [FS27.452]) seek the following amendments to Objective O19:</p> <ul style="list-style-type: none"> • Amend Clause (a): (a) water quality, flows, water levels and aquatic and coastal habitats are managed to maintain <u>and improve</u> biodiversity, aquatic ecosystem health and mahinga kai, and • Amend Clause (c): (c) restoration of aquatic ecosystem health and mahinga kai is encouraged <u>undertaken and required where land is developed that contains freshwater bodies.</u> • Amend note: For the purposes of this objective 'a reasonable timeframe' is a date for the applicable water body or coastal marine area inserted into this Plan through the plan change/s required by the RMA to implement the NPS-FM 2020, or 2050 <u>2035</u> if no other date is specified by 31 December 2026. <p>Fish and Game [S188.019]⁴⁶ considers Clause (c) requires strengthening, noting that the restoration of a degraded ecosystem is necessary under the NPS-FM rather than encouraged, and seeks the following amendments:</p> <p style="text-align: center;">c) restoration of aquatic ecosystem health and mahinga kai is encouraged. <i>Aquatic ecosystem health and mahinga kai values are maintained where in good health and restored where degraded.</i></p>
Table 3.4	<p>Amend mahinga kai species objective Lynn Cadenhead [S22.012], Yvonne Weeber [S183.071] (supported by MPHRCI [FS27.071]) and Guardians of the Bays [S186.024] (supported by MPHRCI [FS27.447]) seek the mahinga kai species objective to be amended as follows:</p> <p style="text-align: center;"><i>Mahinga kai species, including taonga species, are present in quantities, size and of a quality that is appropriate for the area <u>in a healthy ecological state</u> and reflective of a healthy functioning ecosystem. Huangā of mahinga kai as identified by mana whenua are achieved.</i></p> <p>Consideration of “resilience” Heather Blissett [S45.006] considers the wording within the fish objective of “fish communities are resilient” is too passive and that the term “resilience” suggests that fish communities could be forced to live in extremities of survival.</p>
Policy P30	<p>Include reference to mauri Heather Blissett [S45.008] supports the hydrology provision in Clause (a), however requests that Clause (b) is amended to reference mauri with the following wording: <i>Improve the <u>mauri</u> of the water</i></p> <p>Prioritise “improvement” rather than “maintenance” Generation Zero [S221.002 and S221.011] considers the use of “maintain or where practicable restore” presents restoration as optional and suggests for a focus on improvement as well as restoration. Generation Zero considers the goal for the policy should be improvement rather than maintenance and should align better with the principles of stewardship and kaitiakitanga inherent to Te Mana o te Wai.</p> <p>Improve clarity Woodridge [S255.018] seeks the following relief:</p>

⁴⁶ supported by Forest & Bird [FS23.1175], MPGC [FS21.024] and MPHRCI [FS27.1108], opposed by NZFFA [FS9.019] and WWL [FS39.273]

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> Amend the chapeau as follows: <p style="text-align: center;"><i>Manage the adverse effects of use and development [of land] on biodiversity, aquatic ecosystem health and mahinga kai to: ...</i></p> Improve specificity by removing the words "where practical". Clause (e) relates to "Critical habitat for indigenous aquatic species and indigenous birds", however the wording covers every situation, not just "critical" ones such as breeding and migration. As a result, if there is any indigenous aquatic species or bird species in the area compliance cannot be achieved. It also uses the vague wording "where practical."
Policy P36	<p>Change the use of "restore"</p> <p>PF Olsen [S18.012] seeks for the policy to be amended to change the word restore for the aim of restoring the ecological health and significant values of Wairapara Moana, noting the significance of adhering to legislative principles to ensure changes are effective, clear and fair, and that language should be used that allows adaptability to changing circumstances. PF Olsen considers the use of "restore" or "avoid" inappropriate, as they do not allow adaptability to changing circumstances.</p>
Policy P45	<p>General oppose</p> <p>John Easther [S17.009] considers the protection of introduced species is not relevant to freshwater policy and seeks the policy is either deleted, or clarified to only apply to indigenous trout.</p>
Policy P118 and Rule R106	<p>Taumata Arowai [S116.016] (supported by Forest & Bird [FS23.584]) and [S116.018] (supported by Forest & Bird [FS23.586], supported in part by Meridian [FS47.151]) seeks amendments to Policy P118 and Rule R106 as appropriate to reflect legislative changes to what constitutes a drinking water supply, noting the following:</p> <ul style="list-style-type: none"> Notes the WSA framework for identification, monitoring and management of risks to water sources is intended to work together with resource management legislation. Notes that changes are made to rules that recognise proximity to source water intakes but that no change has been made to the reference to drinking water supplies (community drinking water supply and group drinking water supply) and these references are out of date due to the repeal of the Health (Drinking Water Amendment Act) 2007 and enactment of the WSA.
Rule R104	<p>Heather Blissett [S45.009] questions Rule R104 on the understanding that the roots of vegetation hold land together.</p>

Issue 15: Miscellaneous comments

Sub-issue(s)	Description of matters raised by submitters
Miscellaneous comments	<p>Lynn Cadenhead [S22.001] and Neil Deans [S29.002] note the state of water bodies reflects the use of land, water and other resources in their catchments.</p> <p>In two submission points, Te Rūnanga⁴⁷ note the following:</p> <ul style="list-style-type: none"> That the Te Whanganui a Tara and Te Awarua o Porirua planning frameworks implement the NPS-FM, the Ngāti Toa Statement on the Te Awarua o Porirua Whaitua and Te Mahere Wai for the Te Whanganui a Tara Whaitua. That for first time cultural health of Te Awarua o Porirua and Te Whanganui a Tara is of central importance and there is a pathway towards wai ora involving respect for taonga, restoration of mauri, ecological health, mahinga kai and kaimoana. Submitter is committed to working with the local authorities and Wellington Water Ltd to make these targets achievable especially in relation to stormwater and wastewater discharge consents. <p>Amos Mann [S35.001] considers protection of water quality is of utmost importance as it is vital for all life.</p> <p>Heather Blissett [S45.005] raises concern that PC1 will not prevent Te Awakairangi and Peatland dying along with the tributaries.</p> <p>Sally Kean [S57.006] opposes GWRC controlling the materials and conditions of driveways.</p> <p>Fish and Game [S188.005] (supported by Forest & Bird [FS23.1161], MPGC [FS21.010] and MPHRCI [FS27.1094], opposed by NZFFA [FS9.005]) suggests regular assessments and evaluations of Schedule I important to trout spawning and trout fishery rivers.</p> <p>Heather Phillips [S212.003] raises concern that PC1 does not address waterway obstructions, which can cause waterways to deviate and more sedimentation, and suggests a requirement should be made that when a waterway becomes obstructed by trees or growth it must be cleaned before the waterway is forced to deviate. In another submission point, Heather Phillips [S212.010] notes that fault lines will contribute to high levels of erosion and is not able to be regulated.</p> <p>Generation Zero [S221.001] considers the current quality of water disproportionately affects Ngāti Toa physical health and jeopardizes the cultural practices and mātauranga that reinforce them. Considers this also impacts mana whenua across the Wellington region. Considers collecting kai moana from the harbour is a standard indicator of waterway health in the catchments.</p>

⁴⁷ [S216.003] (with a neutral/not stated stance from Ātiawa ki Whakarongotai Charitable Trust [FS2.001]) and [S216.004] (with a neutral/not stated stance from Ātiawa ki Whakarongotai Charitable Trust [FS2.002])

Sub-issue(s)	Description of matters raised by submitters
	<p>Pat van Berkel [S282.004] recognises the four territorial authorities will need to be behind PC1 and the Whaitua’s recommendations.</p> <p>John Easter [S17.024] references the Rivers Control Act 1941 as a precedent for the management of erosion and protection of property from flood damage.</p>

Issue 16: Consequential relief

Sub-issue(s)	Description of matters raised by submitters
Consequential relief	<p>Horokiwi Quarries [S2.006] (supported in part by WIAL [FS31.100]) seek that the relevant provisions in the Whaitua Te Awarua-o-Porirua (Objectives, Policies and Rules) are amended consistent with their relief sought in submission points within this submission.</p> <p>WIAL [S101.010] (opposed by Forest & Bird [FS23.1263]) seeks for the submission points made in their submission to be accepted, or that the NRP is amended as appropriate to address the submission points, noting the following:</p> <ul style="list-style-type: none"> • Considers that in the absence of amendments to the Proposed NRP to address and give effect to the submission, the proposal will not promote the sustainable management or efficient use and development of natural and physical resources, is not the most appropriate way to achieve the purpose of the RMA, particularly when having regard to the efficiency and effectiveness of the provisions relative to other means, and does not appropriately fulfil the requirements of section 32 of the RMA, particularly in terms of evaluating the costs of implementing the provisions under section 32(2)(a) • Considers the proposal does not represent sound resource management practice particularly with respect to planning for Wellington Airport, as RSI. <p>UHCC⁴⁸ seeks a full legal and planning review of PC1 to be undertaken in accordance with the relief sought in their submission, including any necessary consequential relief. UHCC is also concerned GWRC has not taken on board previous feedback and structural problems have been repeated that hamper the progress of the region. The submitter questions the lawfulness and natural justice of the process in light of the signalled change in policy direction by the government and is concerned about practical implementation of the provisions – including the ability for territorial authorities to conduct business as usual plan-making and road controlling authority activities. UHCC seeks amendments to the plan change or that the plan change is placed on hold to remove problematic provisions identified in the submission.</p> <p>Taranaki Whānui [S286.001] (supported in part by Rangitāne [FS24.002]) seeks for the amendment of definitions as necessary to provide for their relief sought, noting consequential changes may be required for other provisions.</p>

⁴⁸ [S225.023] (supported by Gillies [FS11.010] and Pukerua Holdings [FS30.010], opposed by Forest & Bird [FS23.851]) and [S225.027] (opposed by Forest & Bird [FS23.855])