

Appendix 2: Description of matters raised by Submitters (by issue)

N.B. Submission points highlighted green are addressed in multiple sub-issues. A detailed list of these submission points and the issues/sub-issues in which they are discussed are set out in Appendix 2.1 at the end of this document.

Issue 1: Freshwater Planning Instrument

Sub-issue(s)	Description of matters raised by submitters
Review allocation of provisions to FPP vs P1S1	Winstone Aggregates [S206.022] ¹ raises concern with provisions being subject to the FPP where freshwater is only a peripheral issue to which the provision relates, and considers this is inappropriate use of the FPP, resulting in jurisdictional problems such as restricted appeal rights. Considers improper allocation results in delays and costs and is exacerbated by the proposed activity statuses being too restrictive. Accordingly, Winstone Aggregates seeks for a review of the scope of FPP versus P1S1 processes, and for only provisions where freshwater is the primary issue to be subject to the FPP, with the remaining provisions to be allocated to P1S1.

Issue 2: Policies WH.P1 and P.P1 – Improvement of aquatic ecosystem health

Sub-issue(s)	Description of matters raised by submitters
General support	<p>WWL² seeks for Clause (a) of Policies WH.P1 and P.P1 to be retained due to the wording “progressively reducing the load” reflecting the volume of work that needs to be achieved. Similarly, The Fuel Companies [S258.006 and S258.028] seek for Policies WH.P1 and P.P1 to be retained as notified, with particular reference to Clause (a) recognising that reduction in contaminant loading will be a progressive process.</p> <p>PCC [S240.032] (opposed by NZFFA [FS9.129]) seeks for Policy P.P1 to be retained, noting their support for the progressive reduction of contaminants and restoration of habitats.</p> <p>Kāinga Ora [S257.040] generally supports Policy P.P1 and seeks for it to be retained as notified, on the basis that it focuses on the improvement of ecosystem health and consistency with the NPS-FM.</p> <p>WCC [S33.034 and S33.082] considers Policies WH.P1 and P.P1 are reasonable to achieve improvements to ecosystem health progressively, and seek for the policies to be retained as notified.</p> <p>Yvonne Weeber³ and Fish and Game⁴ support Policies WH.P1 and P.P1 with no reasons stated or decision sought. Guardians of the Bays [S186.102] (supported by MPHRCI [FS27.525]) supports Policy WH.P1 with no reasons stated or decision sought.</p> <p>Pareraho Forest Trust [S213.015] seeks for Policy WH.P1 to be retained as notified, with no reasons stated.</p> <p>Taranaki Whānui [S286.031]⁵ seeks Policy WH.P1 to be retained as notified, noting their support for the progressive reduction of contaminants and restoration of habitats.</p>
Include natural form and character	EDS ⁶ and Forest & Bird ⁷ seek for Clause (b) in both Policies WH.P1 and P.P1 to be amended to read “restoring habitats and natural form and character” to give effect to the NPS-FM.

¹ supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.018]

² [S151.072] (opposed by Forest & Bird [FS23.1399]) and [S151.108] (opposed by Forest & Bird [FS23.1435])

³ [S183.190] (supported by MPHRCI [FS27.190]) and [S183.274] (supported by MPHRCI [FS27.274])

⁴ [S188.039] (supported by Forest & Bird [FS23.1195], MPGC [FS21.044], and MPHRCI [FS27.1128]), opposed by NZFFA [FS9.039]) and [S188.073] (supported by Forest & Bird [FS23.1229], MPGC [FS21.078] and MPHRCI [FS27.1162]), opposed by NZFFA [FS9.073])

⁵ Supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.028] and Rangitāne o Wairarapa [FS24.031]

⁶ [S222.034] (supported by Forest & Bird [FS23.190] and MPHRCI [FS27.926]; opposed in part by R P Mansell; A J Mansell, & M R Mansell [FS26.051] and Transpower [FS20.006]; opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.063], NZFFA [FS9.215], WIAL [FS31.015] and Winstone Aggregates [FS8.014]) and [S222.080] (supported by Forest & Bird [FS23.236] and MPHRCI [FS27.972], opposed in part by R P Mansell; A J Mansell, & M R Mansell [FS26.057] and Transpower [FS20.013], opposed by NZFFA [FS9.261])

⁷ [S261.062] (supported by MPHRCI [FS27.681]; opposed in part by Enviro NZ Services Ltd (Enviro NZ) [FS10.30], Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.033], R P Mansell; A J Mansell, & M R Mansell [FS26.017] and Transpower [FS20.023]; opposed by NZFFA [FS9.389], WIAL [FS31.016] and WWL [FS39.024 and FS39.041]) and [S261.141] (supported by MPHRCI [FS27.760]; opposed in part by R P Mansell; A J Mansell, & M R Mansell [FS26.028] and Transpower [FS20.038]; opposed by NZFFA [FS9.468] and WWL [FS39.028 and FS39.045])

Sub-issue(s)	Description of matters raised by submitters
	<p>Additionally, Forest & Bird [S261.062 and S261.141] seeks for Clause (c) in both Policies WH.P1 and P.P1 to include direction that “enhancement” of flows should be through limits and natural means, rather than “stream augmentation” or managed aquifer recharge, with the following wording to be included: “by setting limits and reducing allocation volumes in over-allocated catchments, and by restoring natural form and character to promote natural aquifer recharge”</p>
<p>Improve or enhance only where required</p>	<p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.024] oppose Policy WH.P1 on the basis that it does not accurately reflect the intent of the objectives to maintain aquatic ecosystem health where TAS are met and improvement where TAS is not met. Guildford Timber, Silverstream Forest and Goodwin Estate consider the objectives provide more flexibility than the “improve” approach of the policy, and seek that it is amended as follows (or similar wording):</p> <p style="text-align: center;"><i>Aquatic ecosystem health will be <u>maintained or improved</u> where relevant target attribute state is not met by:</i></p> <p style="margin-left: 40px;"><i>a) progressively reducing the load or concentration of contaminants, particularly sediment, nutrients, pathogens and metals, entering water <u>where relevant target attribute state is not met</u>, and</i></p> <p style="margin-left: 40px;"><i>b) <u>maintaining or restoring habitats</u> where relevant target attribute state is not met, and</i></p> <p style="margin-left: 40px;"><i>c) <u>maintaining or enhancing the natural flow regime of rivers and managing water flows and levels, where relevant target attribute state is not met</u>, including where there is interaction of flows between surface water and groundwater, and</i></p> <p style="margin-left: 40px;"><i>d) co-ordinating and prioritising work programmes in catchments that require changes to land use activities that impact on water.</i></p> <p>R P Mansell; A J Mansell, & M R Mansell [S217.005 and S217.015] seek the same relief as Guildford Timber, Silverstream Forest and Goodwin Estate for both Policies WH.P1 and P.P1, noting the same reasons.</p> <p>Horokiwi Quarries [S2.018] (supported by Enviro NZ [FS10.29]) seeks amendments for Clauses (a) and (b) of Policy WH.P1 as follows:</p> <ul style="list-style-type: none"> • Considers Clause (a) implies that it is applicable to all water bodies, regardless of whether improvement is required or not, therefore seeking the following amendments: <ul style="list-style-type: none"> <i>a) progressively reducing the load or concentration of contaminants <u>where improvement in water quality is required</u>, particularly sediment, nutrients, pathogens and metals, entering water, and</i> • Considers Clause (b) would apply broadly to all habitats (including exotic), despite the NPS-FM having no requirement to restore all habitats, being limited only to indigenous wetland habitat. Consequently, Horokiwi Quarries seeks that it is amended to clarify that restoration is limited to indigenous habitats and to caveat only to where those habitats have been degraded: <ul style="list-style-type: none"> <i>(b) restoring <u>indigenous habitats that have been degraded</u>, and</i> <p>Winstone Aggregates [S206.035 and S206.063] seek the same relief as Horokiwi Quarries for Clauses (a) and (b) for both Policies WH.P1 and P.P1, noting the same reasons.</p> <p>WWL⁸ seeks for Clause (c) to be amended to replace “enhancing” with “<i>maintaining or improving</i>”, as not all locations will require enhancement.</p>
<p>Enable a more strategic and prioritised approach</p>	<p>WFF⁹ seeks amendments to Policies WH.P1 and P.P1 for consistency with the WIP recommendations and a more strategic and prioritised approach, consisting of two new clauses and amendments to Clauses (a) and (b) as follows:</p> <ul style="list-style-type: none"> • Add new clause: <i>aa) directing improved understanding of key contaminant sources, their connection to waterways and spatial/temporal patterns, and identification of a prioritised programme</i> • Amend a) to add: <i>progressively reducing in priority catchments/locations.</i> • Amend b) to read: <i>progressively restoring habitats in priority locations.</i> • Add new clause <i>e) to provide for Council to enter into voluntary buy-out of sites/land where significant changes in land use activities may be required</i>

⁸ [S151.072] (opposed by Forest & Bird [FS23.1399]) and [S151.108] (opposed by Forest & Bird [FS23.1435])

⁹ [S193.067] (supported by NZTA [FS28.063], opposed by Forest & Bird [FS23.1023]) and [S193.119] (supported by NZTA [FS28.064], opposed by Forest & Bird [FS23.1075])

Sub-issue(s)	Description of matters raised by submitters
Further consideration of feasibility/achievability	<p>NZTA [S275.011] (supported by WWL [FS39.104], opposed by Forest & Bird [FS23.705]) supports the intent to reduce contaminant loads, however considers further information should be provided before targets are adopted, noting that it is unclear if and how the reduction can be sustained. NZTA also cites inconsistencies and gaps in the S32 assessment of economic costs, and seeks for further consideration of the feasibility and costs of the targets.</p> <p>UHCC [S225.066] (opposed by Forest & Bird [FS23.894]) raises concern with the practicality of working to reduce all contaminants at once, and seeks clarification on whether Clauses (a) – (c) of Policy WH.P1 are achievable within the ten-year planning cycle, or whether some contaminants should be prioritised.</p>
Enable work programmes that seek to improve aquatic ecosystem health	<p>Horokiwi Quarries [S2.018] (supported by Enviro NZ Services Ltd (Enviro NZ) [FS10.29]) raises the following regarding Clause (d) of Policy WH.P1:</p> <ul style="list-style-type: none"> • That it is unclear about what is being coordinated and prioritised • That it is unclear what “catchments that require changes to land use activities that impact on water” means, who it is decided by, or what the activities are. • That it is a method rather than a policy directive, and suggests for it be considered as such. <p>Horokiwi Quarries suggests the clause should rather refer to enabling work programmes that provide for improvement, seeking the following amendments:</p> <p style="text-align: center;"><i>(d) co-ordinating and prioritising enabling work programmes in catchments that seek to improve aquatic ecosystem health require changes to land use activities that impact on water.</i></p> <p>Winstone Aggregates [S206.035 and S206.063] seeks the same relief as Horokiwi Quarries for Clause (d) for both Policies WH.P1 and P.P1, noting the same reasons.</p>
Clarify “work programmes”	<p>WWL¹⁰ seeks for “work programmes” to be defined, or a more specific term used, to clarify that it does not relate to local authority networks.</p>
Clarify “land use” to include urban land use	<p>CFG¹¹ considers the term “land use” in Clause (d) of Policies WH.P1 and P.P1 is associated more with rural or primary production land uses, and seek for the clause to be amended to include urban land use.</p>
Recognise regionally significant infrastructure	<p>WIAL [S101.042] (opposed by Forest & Bird [FS23.1295]) generally supports the intention of Policy WH.P1 however raises concern that at an individual consent level, while endeavours are made to achieve Clauses (a) to (d), it may not always be practicable given the nature and scale of activities undertaken by RSI. WIAL considers the policy requires further amendment to recognise the operational and functional requirements of RSI, consistent with Objective O9 of the NRP, and that as currently drafted the policy will limit the ability of infrastructure providers in the region to meet the needs of the regions communities. Consequently, WIAL seeks the following relief:</p> <ul style="list-style-type: none"> • Review the extent to which the policy should apply to sites containing critical infrastructure; and review whether such a policy is appropriate where it is also necessary to utilise natural and physical resources to meet the economic and social needs of Wellington’s communities. • Alternatively, amend the policy to ensure it considers the extent to which (a) to (d) is practicable in the context of RSI; or delete and revert to Operative NRP.
Amend for consistency with NZCPS	<p>The Minister of Conservation¹² supports the intent of Policies WH.P1 and P.P1, however seeks they are amended for consistency with Policy 23 of the NZCPS with the addition of a new clause as follows:</p> <p style="text-align: center;"><i>(e) reducing contaminant and sediment loadings in stormwater at source, through contaminant treatment and by controls on land use activities.</i></p>

¹⁰ [S151.072] (opposed by Forest & Bird [FS23.1399]) and [S151.108] (opposed by Forest & Bird [FS23.1435])

¹¹ [S288.045] (opposed by Forest & Bird [FS23.069]) and [S288.086] (opposed by Forest & Bird [FS23.110])

¹² [S245.002] (supported by Forest & Bird [FS23.464] and WWL [FS39.144], opposed by NZTA [FS28.021]) and [S245.018] (supported by Forest & Bird [FS23.480] and WWL [FS39.147], opposed by NZTA [FS28.033])

Issue 3: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives

Sub-issue(s)	Description of matters raised by submitters
General support	<p>Yvonne Weeber¹³ and Fish and Game¹⁴ support Policies WH.P2 and P.P2 with no reasons stated or decision sought. Guardians of the Bays [S186.103] (supported by MPHRCI [FS27.526]) supports Policy WH.P2 with no reasons stated or decision sought.</p> <p>Pareraho Forest Trust [S213.016] seeks for Policy WH.P2 to be retained as notified, with no reasons stated.</p> <p>Water NZ [S246.031] (opposed by WMNZ [FS46.047]) is generally supportive of Policy WH.P2 and its clauses, with no reasons stated.</p> <p>The Fuel Companies¹⁵ seek for Policies WH.P2 and P.P2 to be retained as notified, particularly Clause (b) on the basis that it recognises that in some cases, best practice measures may already be in place such that further reduction may not be practicable or appropriate in the context of the development activity. The Fuel Companies also support the network-scale approach for the reduction in contaminant loads in Clause (d).</p>
Oppose financial contributions as an offset	<p>Forest & Bird¹⁶ support the prohibition of unplanned greenfield development, however oppose Clause (a) of Policies WH.P2 and P.P2 on the basis that financial contributions as compensatory measures for stormwater contamination are not an “offset” and are contrary to S107 of the RMA, the NZCPS, and the effects management hierarchy of the NPS-FM.</p>
Avoid significant adverse effects from earthworks, forestry and vegetation clearance	<p>EDS¹⁷ seeks for Clause (f) of Policies WH.P2 and P.P2 to be amended to require the avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities to give effect to the NPS-FM.</p>
Include reference to ephemeral watercourses, wetlands and estuaries	<p>Forest & Bird [S261.063 and S261.142] considers that livestock should be excluded from ephemeral watercourses, estuaries and wetlands due to having high ecological value and consequently seeks for Clause (e) of Policies WH.P2 and P.P2 to be amended to refer to ephemeral watercourses, wetlands and estuaries.</p>
Clarify scope for management of rural land use	<p>Forest & Bird [S261.063 and S261.142] considers that additional direction is required to give clear scope for the management of rural land uses, and consequently seeks the addition of a new clause to Policies WH.P2 and P.P2 as follows:</p> <p><i>(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited</i></p>
Clarify interactions between provisions	<p>WWL¹⁸ seek the following relief for Policies WH.P2 and P.P2:</p> <ul style="list-style-type: none"> • Clarification on how FAP provisions will work alongside existing TAS provisions, network discharge consent provisions, and particularly Schedules 31 and 32. • Clarification on the relationship between “non-regulatory methods” and “work programmes”. • Amendment of Policies WH.P2 and P.P2 as necessary to appropriately reflect the abovementioned interrelationships.
Achieve objectives through non-regulatory methods	<p>Pauatahanui Residents Association [S16.009] raises concerns on Policy P.P2 that regulatory methods can lead to perverse outcomes, including intensification as rural landowners may choose to subdivide to smaller block sizes to maximise returns, and seek for the chapeau of the policy to be amended as follows:</p>

¹³ [S183.191] (supported by MPHRCI [FS27.191]) and [S183.275] (supported by MPHRCI [FS27.275])

¹⁴ [S188.040] (supported by Forest & Bird [FS23.1196], MPGC [FS21.045] and MPHRCI [FS27.1129]), opposed by NZFFA [FS9.040] and [S188.074] (supported by Forest & Bird [FS23.1230], MPGC [FS21.079] and MPHRCI [FS27.1163]), opposed by NZFFA [FS9.074])

¹⁵ [S258.007] (opposed by WMNZ [FS46.041]) and [S258.029]

¹⁶ [S261.063] (supported by MPHRCI [FS27.682]; opposed in part by Ara Poutama [FS41.001] and Transpower [FS20.024]; opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.034], Hort NZ [FS1.035], NZFFA [FS9.390], R P Mansell; A J Mansell, & M R Mansell [FS26.018], WIAL [FS31.024] and WWL [FS39.072]) and [S261.142] (supported by MPHRCI [FS27.761]; opposed in part by Ara Poutama [FS41.005] and Transpower [FS20.039]; opposed by Hort NZ [FS1.060], NZFFA [FS9.469], R P Mansell; A J Mansell, & M R Mansell [FS26.029], WWL [FS39.073] and WMNZ [FS46.040])

¹⁷ [S222.035] (supported by Forest & Bird [FS23.191] and MPHRCI [FS27.927]; opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.064], Kāinga Ora [FS45.022], Meridian [FS47.164], NZFFA [FS9.216], NZTA [FS28.050], R P Mansell; A J Mansell, & M R Mansell [FS26.052], WIAL [FS31.020] and WMNZ [FS46.052]) and [S222.081] (supported by Forest & Bird [FS23.237] and MPHRCI [FS27.973]; opposed by NZFFA [FS9.262], NZTA [FS28.051] and R P Mansell; A J Mansell, & M R Mansell [FS26.058])

¹⁸ [S151.073] (supported by NZTA [FS28.140], opposed in part by Kāinga Ora [FS45.084], opposed by Forest & Bird [FS23.1400]) and [S151.109] (supported by NZTA [FS28.168], opposed in part by Kāinga Ora [FS45.085], opposed by Forest & Bird [FS23.1436])

Sub-issue(s)	Description of matters raised by submitters
	<p><i>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: Target attribute states and coastal water objectives will be achieved by non-regulatory methods, including Freshwater Action Plans, that encourage good management practices. Where measurable improvements in target attribute states are not being achieved, and where actions can have measurable outcomes such as discharges of contaminants, regulatory methods may be required</i></p>
<p>Clarify freshwater TAS versus coastal water objectives</p>	<p>WIAL [S101.043] (opposed by Forest & Bird [FS23.1296]) considers Policy WH.P2 is onerous and that clarification is needed in the chapeau to clarify that TAS only apply to freshwater, while coastal water objectives apply to coastal water.</p>
<p>Identify targets for non-TAS matters</p>	<p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.025]¹⁹ seeks for further consideration to be given to the identification of targets that are not covered by TAS.</p>
<p>Clarify scope of Clause (a)</p>	<p>WIAL [S101.043] (opposed by Forest & Bird [FS23.1296]) raises the following concerns regarding the scope of Policy WH.P2 Clause (a):</p> <ul style="list-style-type: none"> • The definition of “unplanned greenfield development” references the undefined term “greenfield development” and “other greenfield development”, and certainty is required on what is (or is not) captured by the policy. • It is not clear whether the clause would extend to infrastructure (such as Wellington Airport) or one-off developments for which resource consent can be sought. • The designation mechanism would be undermined if the clause were to apply to designations.
<p>Oppose prohibited activity status (Clause (a))</p>	<p>WIAL [S101.043] (opposed by Forest & Bird [FS23.1296]) opposes Policy WH.P2, noting one of their proposals to establish a small community precinct with an area of Open Space-zoned land on Lyall Parade which would be prohibited under Clause (a), despite positive outcomes including for indigenous vegetation. WIAL seeks for the policy to be amended to address this, or to delete and revert to the Operative NRP.</p> <p>Horokiwi Quarries [S2.019] (supported by Enviro NZ [FS10.32]) considers the prohibition on unplanned green development is inappropriate due to the definition of “unplanned greenfield development” being broad and uncertain, noting the following:</p> <ul style="list-style-type: none"> • Considers this policy to be inappropriate because the definition of “unplanned greenfield development” is broad and uncertain. On this basis, Horokiwi Quarries considers the prohibition on unplanned greenfield development inappropriate. • It is understood by the submitter that GWRC are focused primarily on unplanned urban development. The submitter seeks changes to this clause to clarify this. Considers this clause also currently prescribes the activity status of an activity, rather than being focused on an adverse effect. • Considers financial contributions to offset residual adverse effects from stormwater contaminants is inconsistent with the NPS-FM and limits the ability to implement the effects management hierarchy. Suggests aquatic offsetting or aquatic compensation is required where there are more than minor residual adverse effects, rather than residual adverse effects generally. The submitter expects there will be some residual adverse effect, which is appropriate, provided that the effect is no more than minor. • Considers this clause implies that financial contributions are the only form of offset that may be provided. Suggest that as Appendix 6 of the NPS-FM sets out principles that are to be applied when identifying an appropriate aquatic offset, it would be contrary to the NPS-FM to not allow for consideration against those principles. • Considers that whilst the clause implies that only offsetting may be applied, the effects management hierarchy provides for aquatic compensation where aquatic offsetting is not able to be provided. The submitter accepts that a financial contribution may be an appropriate form of aquatic offset, but seeks that the policy does not frustrate the ability for other forms of aquatic offsetting or aquatic compensation to be undertaken. <p>Consequently, Horokiwi Quarries seeks for Clause (a) of Policy WH.P2 to be amended as follows:</p> <p><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the discharge of stormwater contaminants 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 requiring financial contributions as to an aquatic offset adverse effects from residual stormwater contaminants, and</i></p> <p>Regarding Policies WH.P2 and P.P2, WCC²⁰ raises concern with the prohibitive provisions framework and question if it is the most appropriate to achieve the objectives and policies of the NPS-FM. WCC considers the prohibited activity status is not demonstrated through the s32 report as the most appropriate option to achieve the objectives of the plan and considers Discretionary Activity status is more appropriate, noting as per case law that prohibited activity status should not be used to defer an evaluation of a particular activity until such time as a plan change is lodged to allow undertaking the activity in question. WCC considers the district plan is the most appropriate tool to manage urban development as set out in section 3.5(4) of the NPS-FM. WCC raises concern that the policy will hinder the rezoning of land with inappropriate 'legacy' zoning including sites that could be converted to housing, community facilities, education facilities and not expand the current urban boundary. WCC recommends that for development connected to the local authority stormwater networks, GWRC sets out the reduction requirements in the s15 global stormwater</p>

¹⁹ supported by Cannon Point [FS22.012], supported in part by Meridian [FS47.163]

²⁰ [S33.035] (supported by Cannon Point [FS22.010], supported in part by WIAL [FS31.017]) and [S33.083]

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	<p>discharge consent via the stormwater management strategy and Territorial Authorities then implement the regulatory aspects of the stormwater management strategy through land use consents in the District Plan. WCC seeks for Clause (a) of Policies WH.P2 and P.P2 to be amended as follows:</p> <p><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants; and</i></p> <p>Summerset²¹ opposes prohibiting unplanned greenfield growth as set out in Policies WH.P2 and P.P2, raising the following:</p> <ul style="list-style-type: none"> • Concerned the activity status will provide no consenting pathway for proposals located in these areas that may have positive/better outcomes for the community, freshwater and intensive rural activities. • Considers the prohibited activity status to be inaccurate, inappropriate and unjustified by the Section 32 Evaluation which states that all contaminants can be mitigated with a combination of treatment and the use of financial contributions (refer paragraph 64 of Part C). • Considers the prohibited activity status to be inconsistent with Policy 8 of the NPS-UD. • Based on the S32 report, the submitter assumes the purpose of the prohibited activity status is to require both a regional and district plan change to enable greenfield development. Concerned the two plan changes will make it difficult for the market to be responsive to providing housing, be expensive and impact the economic viability of development. • Concerned these impacts on housing supply have not been sufficiently assessed in the Section 32 Evaluation. <p>Consequently, Summerset seeks for Clause (a) of Policies WH.P2 and P.P2 to be amended as follows:</p> <p><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants; and</i></p> <p>Gillies [S161.011²² and S161.026], Pukerua Holdings [S165.011 (supported by WMNZ [FS46.057]) and S165.026], Koru Homes²³ and Arakura Plains [S173.011 (supported by WMNZ [FS46.059]) and S173.026] oppose the provisions for unplanned greenfield growth, raising the following:</p> <ul style="list-style-type: none"> • Considers prohibited activity status does not provide a consenting pathway to consider a proposal that may have positive outcomes for the community or for freshwater. • Notes that the Section 32 report states that all contaminants can be mitigated through treatment and financial contributions, and considers that prohibited activity status is inappropriate in this case. • Further considers the prohibited activity status inconsistent with Policy 8 of the NPS-UD. • Notes that the s32 report sets out the prohibited activity status to require both a regional and district plan change to enable greenfield development. Considers the need for two plan changes will be expensive and will make it difficult for market responsiveness to the provision of housing. <p>Consequently, Gillies, Pukerua Holdings, Koru Homes and Arakura Plains seek for Clause (a) of Policies WH.P2 and P.P2 to be amended as follows:</p> <p><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants; and</i></p> <p>Transpower²⁴ considers Policies WH.P2 and P.P2 to be inappropriate due to the definition of “unplanned greenfield development” being broad and uncertain, raising the following:</p> <ul style="list-style-type: none"> • The policies could prohibit maintenance, upgrading and development of RSI (including the National Grid). • Considers the prohibition on unplanned greenfield development is inappropriate and must be removed. • If Transpower’s relief sought on the definition of “unplanned greenfield development” were to be granted in full, Transpower would adopt a neutral position on this aspect of the policies. • Considers amendment to the policies are necessary to ensure they are consistent with the effects management hierarchy set out in the NPS-FM. • Consider 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). 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.

²¹ [S38.005] (supported by Cannon Point [FS22.011] and WMNZ [FS46.055], supported in part by WIAL [FS31.018], with a neutral/not stated stance from Woodridge [FS16.066]) and [S38.020]

²² supported by HUD [FS48.008] and WMNZ [FS46.056], with a neutral/not stated stance from Woodridge [FS16.067]

²³ Koru Homes [S169.005] (with a neutral/not stated stance from Woodridge [FS16.037]), [S169.006] (supported by WMNZ [FS46.058], supported in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.045] and R P Mansell; A J Mansell, & M R Mansell [FS26.036], with a neutral/not stated stance from Woodridge [FS16.068]) and [S169.021] (supported in part by R P Mansell; A J Mansell, & M R Mansell [FS26.042])

²⁴ [S177.020] (supported by WMNZ [FS46.060], supported in part by WIAL [FS31.019], opposed by Forest & Bird [FS23.763]) and [S177.046] (opposed by Forest & Bird [FS23.789])

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> • Considers if applicants can provide alternative effective methods of aquatic offsetting as part of proposals in accordance with Appendix 6 of then NPS-FM, then financial contributions should not be required. <p>Transpower seek for Clause (a) of Policies WH.P2 and P.P2 to be amended as follows:</p> <p><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the discharge of stormwater contaminants from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor, requiring aquatic offsetting or compensation (which may include financial contributions) as to offset adverse effects from residual stormwater contaminants, and</i></p> <p>Ara Poutama [S248.020 and S248.044] seeks the same relief as Transpower for Clause (a) of Policies WH.P2 and P.P2, noting the same reasons.</p> <p>Winstone Aggregates [S206.036] (supported by WMNZ [FS46.061]) and [S206.064] raises the following:</p> <ul style="list-style-type: none"> • That 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 are inconsistent with the NPS-FM and limit 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 is 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>Consequently, Winstone Aggregates seeks for Clause (a) of Policies WH.P2 and P.P2 to be amended as follows:</p> <p><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants 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 requiring financial contributions as to an aquatic offset adverse effects from residual stormwater contaminants, and</i></p> <p>Firth Industries [S207.008²⁵ and S207.020] notes the following:</p> <ul style="list-style-type: none"> • Clause (a) of Policies WH.P2 and P.P2 prescribes the activity status rather than addressing adverse effects, which is inappropriate for a policy. • Reference to prohibiting unplanned greenfield development should be removed, in favour of focussing on minimising effects. • Amendment to the policies are necessary to ensure that they are consistent with the effects management hierarchy set out in the NPS-FM. • Aquatic offsetting is only necessary where effects are more than minor, and resource consent applicants should be encouraged to minimise residual adverse effects so that they are no more than minor (in which case aquatic offsetting is not required). • If aquatic offsetting or compensation is required, financial contributions as proposed by PC1 should be available as a discretionary option for achieving offsetting, not a mandatory requirement. • If an alternative effective method of aquatic offsetting or compensation as part of their proposal in accordance with Appendix 6 of the NPS-FM can be provided, financial contributions (on top of this) should not be required. <p>Firth Industries seeks amendments to Clause (a) of Policies WH.P2 and P.P2 as follows:</p>

²⁵ supported by Enviro NZ Services Ltd (Enviro NZ) [FS10.31] and WMNZ [FS46.062]

Sub-issue(s)	Description of matters raised by submitters
	<p><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the discharge of stormwater contaminants from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor, requiring aquatic offsetting or aquatic compensation (which may include financial contributions) as an aquatic offset to offset adverse effects from residual stormwater contaminants, and</i></p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.025] (supported by Cannon Point [FS22.012], supported in part by Meridian [FS47.163]) consider the objectives do not require the restrictive approach of Policy WH.P2 and consider the dual process for unplanned greenfield development is unwarranted as there is no such process in the RMA, seeking for Clause (a) to be amended as follows:</p> <p><i>(a) Encourage prohibiting unplanned and other greenfield development and for other greenfield developments minimising the to minimise contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</i></p> <p>Cannon Point [S260.004] (opposed by Forest & Bird [FS23.007]) seeks the same relief as Guildford Timber, Silverstream Forest and Goodwin Estate for Clause (a) of Policy WH.P2, noting the PC1 objectives do not warrant prohibition of unplanned greenfield development as it would foreclose any opportunity to manage effects to achieve TAS and coastal water objectives, suggesting an effects management approach would better allow for the competing directives of the NPS-FM and NPS-UD to be resolved.</p> <p>HCC [S211.010]²⁶ raises concern with prohibited activity status proposed for unplanned greenfield development under Policy WH.P2, noting the following:</p> <ul style="list-style-type: none"> • The prohibited activity status precludes consenting pathways for development in unplanned greenfield areas which may have positive outcomes. • Concern that minor activities which extend into unplanned greenfield areas would be prohibited. • Considers the s32 evaluation insufficient to justify the proposed prohibited activity status, noting contradictions regarding the ability of PC1 to mitigate contaminants from urban developments. • Considers that the prohibition on greenfield development is inconsistent with the NPS-UD, particularly Policy 8, and may conflict with HCC’s ability to give effect to the NPS-UD. • Notes commentary provided in the s32 report which states that unplanned greenfield development is to be prohibited to enable a future regional plan change alongside a district plan change, and considers that there will be a high economic cost to undertake two simultaneous plan changes, which is not sufficiently assessed in the s32 report. <p>HCC seeks for the policy direction to be amended to “avoid”, with a non-complying activity status, with the following relief sought specifically for Clause (a) of Policy WH.P2:</p> <p><i>(a) prohibiting avoiding unplanned greenfield development and for managing other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</i></p> <p>Te Rūnanga [S216.005]²⁷ supports a dedicated planning approach to development and considers urban sprawl should be avoided when it results in poor environmental outcomes, however seeks clarification on the provisions relating to “unplanned greenfield development” and the type of activities that would be captured. Te Rūnanga further raises the following concerns:</p> <ul style="list-style-type: none"> • Land returned or acquired by Ngāti Toa Rangatira under the Ngāti Toa Rangatira Deed of Settlement Act 2014 may involve historical legacy zones or activities which have been inherited from previous owners or land uses such as former education and corrections facilities, and there may be unanticipated challenges relating to existing (historical) infrastructure that may trigger the unplanned greenfield development rule, despite new development aiming to achieve high standards of wastewater and stormwater disposal. • Te Rūnanga notes similar issues which may exist for areas where resource consents have been granted for activities in unplanned greenfield development areas but the zoning is yet to reflect existing activity, noting upgrades to facilities in rural areas as an example, with concern that the upgrades may not justify the expense and time of a private plan change process. • Considers there must be a strong alignment between the provisions of district plans and the NRP with regard to signalling land that may become part of future development areas, noting the maps on pages 86-89 may become outdated due to district plan reviews as an example, and that two plan change processes would be required. <p>Consequently, Te Rūnanga seeks the following relief:</p> <ul style="list-style-type: none"> • Clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by the rule and the appropriate rule category. • Amend the plan change to provide a more balanced and nuanced approach with regard to managing the tension between restricting urban sprawl and provision for practical flexibility for development in non-urban areas. • Amend Clause (a) of Policy WH.P2 to replace “prohibiting” with “restricting”. <p>R P Mansell; A J Mansell, & M R Mansell [S217.028 and S217.030] raises the following concerns:</p>

²⁶ supported by WWL [FS39.095], supported in part by HUD [FS48.007] and WMNZ [FS46.063], opposed by Forest & Bird [FS23.356], with a neutral/not stated stance from Woodridge [FS16.069]

²⁷ supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.003], Rangitāne [FS24.107], WCC [FS36.009] and WMNZ [FS46.064], supported in part by Rosco Ice Cream [FS43.001], opposed by MPGC [FS21.103]

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> • The use of the prohibited activity status for unplanned greenfield development is inappropriate, as the effects are not specified for any particular area. • The proposed approach is onerous, costly and will not achieve implementation of the NPS-UD. • The current rules of the NRP and the proposed PC1 rules for planned greenfield development are sufficient to manage the adverse effects of unplanned greenfield development. <p>R P Mansell; A J Mansell, & M R Mansell seek either for the deletion of Policies WH.P2 and P.P2, or for the recategorisation of the prohibited activity status for stormwater discharges associated with unplanned greenfield development.</p> <p>Cuttriss²⁸, Carrus²⁹ and Thames Pacific³⁰ oppose prohibited policies and rules, raising concern that prohibiting activities can lead to perverse outcomes (such as with the NES-F) as there is no consenting pathway to consider proposals that have a net positive impact on the environment, including freshwater and coastal systems. Cuttriss seeks for Clause (a) of Policies WH.P2 and P.P2 to be amended to remove references to prohibiting unplanned greenfield development as follows:</p> <p style="padding-left: 40px;"><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants,</i></p> <p>Rosco Ice Cream [S220.010] (supported by WMNZ [FS46.053]) opposes Policy WH.P2 due to the prohibition of unplanned greenfield development, seeking for the policy to be amended to restrict discharges from unplanned greenfield development.</p> <p>UHCC [S225.067]³¹ seeks for Clause (a) of Policy WH.P2 to be amended to replace “prohibiting” with “managing”, noting the following reasons:</p> <ul style="list-style-type: none"> • Opposes prohibition of development, as it limits options to give effect to NPS-UD and overrides District Plan changes and reviews currently underway or proposed in future. • Considers greenfield development has more opportunity to address effects, particularly given space available to incorporate design and infrastructure solutions when compared to constrained urban environments. • Notes prohibition in policy, and direction in objective above it, would render a future plan change impossible as it would not implement higher order documents. • Considers the section 32 analysis would need to consider provisions PC1 and recent changes to NRP and therefore would be at risk of being contrary to objectives and policies in these plans. <p>Parkvale Road Limited [S236.006] (supported by WMNZ [FS46.049]) opposes the approach towards unplanned greenfield development and seeks amendments to Clause (a) of Policy WH.P2 to provide for stormwater quality matters to be addressed appropriately:</p> <p style="padding-left: 40px;"><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants from greenfield developments and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</i></p> <p>Peka Peka Farm [S251.005 (supported by WMNZ [FS46.044]) and [S251.010] seeks the same relief as Parkvale Road Limited for both Policies WH.P2 and P.P2, noting the same reasons.</p> <p>PCC [S240.033]³² raises several concerns regarding the prohibition of unplanned greenfield development:</p> <ul style="list-style-type: none"> • Considers there may be unintended consequences with no consenting pathway to consider a proposal that may have positive outcomes, including for freshwater. • Considers the activity status to be blunt instrument that would prohibit small incursions into identified areas, such as a new road connecting urban areas (or urban to rural areas) if it needed to “clip” an area mapped as unplanned. • Considers the policy direction should be amended to “avoid” with a non-complying activity status. • Considers the s32 evaluation is insufficient to justify the application of prohibited activity status, noting it contains contradictory statements regarding the ability of PC1 to mitigate contaminants from urban developments, and questions how a prohibited activity status can be justified on an effects management basis if PC1 manages all water quality effects, including residual effects as stated in the s32 evaluation.

²⁸ [S219.009] (supported by Land Matters [FS13.072], Orogen Limited [FS34.028] and R P Mansell; A J Mansell, & M R Mansell [FS26.063], with a neutral/not stated stance from Woodridge [FS16.070]) and [S219.021] (supported by Land Matters [FS13.068], Orogen Limited [FS34.026] and R P Mansell; A J Mansell, & M R Mansell [FS26.068])

²⁹ [S247.009] (supported by Orogen Limited [FS34.005] and WMNZ [FS46.046], opposed by MPHRCI [FS27.1198], with a neutral/not stated stance from Woodridge [FS16.072]) and [S247.021] (supported by Orogen Limited [FS34.007], opposed by MPHRCI [FS27.1210], with a neutral/not stated stance from Woodridge [FS16.149])

³⁰ [S252.009] (supported by R P Mansell; A J Mansell, & M R Mansell [FS26.074] and WMNZ [FS46.043]) and [S252.020] (supported by R P Mansell; A J Mansell, & M R Mansell [FS26.079])

³¹ supported by Cannon Point [FS22.013], Gillies [FS11.016], HUD [FS48.009], Pukerua Holdings [FS30.016], WCC [FS36.042] and WMNZ [FS46.051], supported in part by WIAL [FS31.021], opposed by Forest & Bird [FS23.895], with a neutral/not stated stance from Woodridge [FS16.071]

³² supported by Gillies [FS11.031], Pukerua Holdings [FS30.029], opposed in part by Peka Peka Farm [FS29.012], opposed by NZFFA [FS9.130]

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> • Considers the prohibition on greenfield development is inconsistent with the NPS-UD, may directly conflict with PCC’s ability to give effect to the NPS-UD, and present challenges or territorial authorities to consider a plan change in unplanned greenfield areas as per Policy 8 of the NPS-UD. • Concerned that having to undertake two plan changes would impede urban development, and the economic impact of this is not fully assessed in the s32 evaluation with regard to the NPS-UF or impacts on housing and business capacity. • PCC also raises concerns with specific unplanned areas: <ul style="list-style-type: none"> ○ Considers Map 86 is inconsistent with the decisions on the proposed Porirua District Plan, noting instances where unplanned areas include Future Urban Zone areas such as Waitanirua, Pukerua Bay and Judgeford. ○ Considers the identification of Hongoeka as unplanned urban development area will likely be of concern to Hongoeka Whanau. <p>Consequently, PCC seeks for Clause (a) of Policy P.P2 to be amended as follows:</p> <p><i>(a) prohibiting avoiding unplanned greenfield development and for managing other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</i></p> <p>WMNZ [S256.009] (opposed by MPHRCI [FS27.1052]) opposes the policy direction to prohibit unplanned greenfield development, noting the following:</p> <ul style="list-style-type: none"> • Considers discharges from unplanned greenfield development may be able to be managed and have an acceptable effect and not all discharges from unplanned greenfield development areas need to be avoided to achieve TAS. • Considers each proposal requires assessment on a case by-case basis. • Considers “restricting” discharges would better achieve the intent of higher order documents. <p>Accordingly, WMNZ seeks for Clause (a) of Policy WH.P2 to be amended as follows:</p> <p><i>(a) restricting avoiding discharges from unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</i></p> <p>Kāinga Ora³³ generally supports Policies WH.P2 and P.P2, however seeks for Clause (a) of Policies WH.P2 and P.P2 to be amended to remove references to prohibiting unplanned greenfield development.</p> <p>Taranaki Whānui [S286.032]³⁴ raises the following:</p> <ul style="list-style-type: none"> • Concerned policy and provisions will impose significant costs and impact the ability of Taranaki Whānui whanau to develop their ancestral lands. • Notes land not yet returned to Māori ownership through treaty settlements, includes many sites in areas mapped as “unplanned greenfield land” including rural and open space land. Considers prohibition on developing these lands inconsistent with principles of Te Tiriti and inconsistent with need to provide for broader housing affordability and innovation on both Māori and all other land. • Considers planning processes need to be flexible to ensure aspirational outcomes are achieved. • Seeks freshwater effects of development of these sites are addressed through a regional consent process rather than a regional plan change. <p>Consequently, Taranaki Whānui seeks for Policy WH.P2 to be amended as follows:</p> <p><i>(a) prohibiting unplanned greenfield development and for managing other greenfield developments by minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</i></p>
Oppose/amend reduction of urban contaminant load (Clause (b))	<p>Amend to encourage reduction of urban contaminant load where appropriate</p> <p>WWL³⁵ considers Clause (b) of Policies WH.P2 and P.P2 is too vague and should clearly state that redevelopment in existing urban areas will be encouraged, noting this provides opportunities to reduce the existing contaminant load, and redevelopment will be required to reduce the existing contaminant load, seeking the following relief:</p>

³³ [S257.011] (supported by HUD [FS48.010] and WIAL [FS31.023]) and [S257.041] (HUD [FS48.036])

³⁴ supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.029], Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.053], HUD [FS48.011], Rangitāne [FS24.032] and WMNZ [FS46.039]

³⁵ [S151.073] (supported by NZTA [FS28.140], opposed in part by Kāinga Ora [FS45.084], opposed by Forest & Bird [FS23.1400]) and [S151.109] (supported by NZTA [FS28.168], opposed in part by Kāinga Ora [FS45.085], opposed by Forest & Bird [FS23.1436])

Sub-issue(s)	Description of matters raised by submitters
	<p><i>(b) encouraging and where appropriate, requiring that redevelopment activities within existing urban areas to shall reduce the existing urban contaminant load, and</i></p> <p>Delete clause HCC [S211.010]³⁶ considers Clause (b) of Policy WH.P2 is not consistent with, and duplicates, Clauses (c) and (d), noting the use of “encouraging” in Clause (b) is inconsistent with “imposing” in Clause (c) and “requiring” in Clause (d). HCC therefore seeks for Clause (b) of Policy WH.P2 to be deleted.</p> <p>PCC [S240.033]³⁷ seeks for the deletion of Clause (b) from Policy P.P2, noting the same reasons as HCC.</p> <p>Unclear what methods “encourage” redevelopment of existing urban areas WIAL [S101.043] (opposed by Forest & Bird [FS23.1296]) considers it is unclear what methods within the plan “encourage” redevelopment of existing urban areas.</p> <p>Amend rules to “encourage” rather than “require” Woodridge [S255.040] notes that despite the “encourage” direction from Policy P.P2 Clause (b), that the rules do not encourage redevelopments to reduce urban contaminant loads, but rather “require” it. Consequently, Woodridge seeks for the amendment of all rules such that they “encourage” and do not “require” developments to reduce urban contaminant loads in accordance with Policy P.P2.</p>
<p>Oppose hydrological controls (Clause (c))</p>	<p>WCC [S33.035]³⁸ and [S33.083] seeks the deletion of Clause (c) from Policies WH.P2 and P.P2, noting their reasons given regarding Clause (a).</p> <p>WWL³⁹ seeks for Clause (c) of Policies WH.P2 and P.P2 to be amended to make allowance for stormwater discharges that are not creating streambank erosion as follows:</p> <p><i>(c) imposing hydrological controls on:</i></p> <p><i>(i) urban development and</i></p> <p><i>(ii) where appropriate and practicable, stormwater discharges to rivers in relation to streambank erosion</i></p> <p>Higgins [S226.004] (with a neutral stance from WMNZ [FS46.050]) is not opposed to Policy WH.P2 in principle and supports freshwater and coastal water quality improvements, however opposes methods regulating discharge such as Clause (c), seeking for the imposition of hydrological controls to be removed or amended to have regard to hydrological controls rather than the imposition of such.</p> <p>Pukerua Property Group [S241.023] (supported in part by Land Matters [FS13.024 and FS13.046]) and Land Matters [S243.011] consider the use of stormwater control to effectively manage or prevent land use is inconsistent with integrated management principles of the RMA and seek the deletion of Policy P.P2. If the policy is not deleted, Pukerua Property Group and Land matters seek amendments to provide opportunities for development within Porirua Whaitua. Specifically, the removal of avoidance principles, to be replaced with the same effect/guidance as the remainder of the NRP before notification, with consideration for policy relief for activities that require consent under the operative provisions.</p> <p>WIAL [S101.043] (opposed by Forest & Bird [FS23.1296]) opposes Policy WH.P2 and considers it is unclear whether Clause (c) relates to urban development which gives rise to stormwater discharges not otherwise discharging to rivers.</p>
<p>Remove requirement to reduce contaminant loads from stormwater networks (Clause (d))</p>	<p>Higgins [S226.004] (with a neutral stance from WMNZ [FS46.050]) is not opposed to Policy WH.P2 in principle and supports freshwater and coastal water quality improvements, however opposes methods regulating discharge such as Clause (d). Higgins seeks for the removal of the requirement for the reduction in contaminant load from stormwater networks, or amendments to include provisions or small site development discharges.</p>

³⁶ supported by WWL [FS39.095], supported in part by HUD [FS48.007] and WMNZ [FS46.063], opposed by Forest & Bird [FS23.356], with a neutral/not stated stance from Woodridge [FS16.069]

³⁷ supported by Gillies [FS11.031] and Pukerua Holdings [FS30.029], opposed in part by Peka Peka Farm [FS29.012], opposed by NZFFA [FS9.130]

³⁸ supported by Cannon Point [FS22.010], supported in part by WIAL [FS31.017]

³⁹ [S151.073] (supported by NZTA [FS28.140], opposed in part by Kāinga Ora [FS45.084], opposed by Forest & Bird [FS23.1400]) and [S151.109] (supported by NZTA [FS28.168], opposed in part by Kāinga Ora [FS45.085], opposed by Forest & Bird [FS23.1436])

Sub-issue(s)	Description of matters raised by submitters
Recognise stormwater management strategies (Clause (d))	<p>WCC [S33.035⁴⁰ and S33.083] recommends that for development connected to local authority stormwater networks, for GWRC to set out the reduction requirements in the global stormwater discharge consent via the stormwater management strategy, with territorial authorities to implement the regulatory aspects of the stormwater management strategy through land use consents in the district plan. Accordingly, WCC seeks for Clause (d) of Policies WH.P2 and P.P2 to be amended as follows:</p> <p style="text-align: center;"><i>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, through stormwater management strategies and</i></p>
Amend exclusion of livestock from water bodies (Clause (e))	<p>Louise Askin [S9.013] seeks for Clause (e) of Policy WH.P2 to be amended to replace “excluding livestock from waterbodies” with “<i>reducing livestock access to waterbodies</i>”, noting that other sections of PC1 do not drive total stock exclusion from all waterways, but instead apply practical assessments that allow for other methods.</p> <p>Hannah Bridget Gray (No2) Trust [S105.013] notes different stock types have different impacts on water bodies and riparian margins, and seeks for consistency with the national regulations for stock exclusions (i.e. beef cattle and deer only on mapped low-sloped land), with Clause (e) of Policy P.P2 to be amended as follows:</p> <p style="text-align: center;"><i>(e) stabilising stream banks by excluding livestock (as defined in the Resource Management (Stock Exclusions) Regulations 2020) from waterbodies and planting riparian margins with indigenous vegetation, and</i></p>
Amend riparian margin planting requirements (Clause (e))	<p>Horokiwi Quarries [S2.019] (supported by Enviro NZ Services Ltd (Enviro NZ) [FS10.32]) supports the direction of Clause (e) of Policy WH.P2, however notes the planting of riparian margins may not always be practicable, and seeks for Clause (e) of Policy WH.P2 to be amended as follows:</p> <p style="text-align: center;"><i>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation where practicable, and</i></p> <p>Winstone Aggregates [S206.036] (supported by WMNZ [FS46.061]) and [S206.064] seeks the same relief as Horokiwi Quarries for Clause (e) of both Policies WH.P2 and P.P2, noting the same reasons.</p> <p>WFF⁴¹ seeks for Clause (e) of Policies WH.P2 and P.P2 to be deleted and replaced with “<i>promote and support riparian fencing and planting</i>”, for consistency with the WIP recommendations to provide incentives to assist implementation of existing national and regional regulations, and consistency with Method M12 of the NRP.</p>
Amend requirement for active management (Clause (f))	<p>WFF⁴² seeks for Clause (f) of Policies WH.P2 and P.P2 to be deleted and replaced with “<i>promote and support erosion and sediment control</i>”, for consistency with the WIP recommendations to provide incentives to assist implementation of existing national and regional regulations, and consistency with Method M12 of the NRP.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.025]⁴³ consider the objectives do not require the restrictive approach of Policy WH.P2 and consider the dual process for unplanned greenfield development is unwarranted as there is no such process in the RMA, seeking for Clause (f) of Policy WH.P2 to either be deleted or amended as follows:</p> <p style="text-align: center;"><i>(f) requiring the active management adopting best practice principles and management of earthworks, forestry, cultivation and vegetation clearance activities, and</i></p> <p>CFG⁴⁴ notes the specified activities in Clause (f) of Policies WH.P2 and P.P2 are already actively managed, and seeks for the clause to be amended to reflect management of specified activities in accordance with established regulatory frameworks and good practice.</p>
Oppose/amend requirement to revegetate with woody vegetation (Clause (g))	<p>WFF⁴⁵ seeks for Clause (g) of Policies WH.P2 and P.P2 to be deleted, for consistency with the WIP recommendations to provide incentives to assist implementation of existing national and regional regulations, and consistency with Method M12 of the NRP.</p> <p>Willowbank [S204.002] (supported in part by Meridian [FS47.313]) considers land and soil qualities restrict the ability to establish woody vegetation, and seeks for Clause (g) of Policy P.P2 to be amended to either delete “<i>with woody vegetation</i>”, or revised to include “<i>with woody vegetation where practicable to do so</i>”</p>

⁴⁰ supported by Cannon Point [FS22.010], supported in part by WIAL [FS31.017]

⁴¹ [S193.068] (supported in part by Meridian [FS47.162], opposed by Forest & Bird [FS23.1024]) and [S193.120] (supported in part by Meridian [FS47.312], opposed by Forest & Bird [FS23.1076])

⁴² [S193.068] (supported in part by Meridian [FS47.162], opposed by Forest & Bird [FS23.1024]) and [S193.120] (supported in part by Meridian [FS47.312], opposed by Forest & Bird [FS23.1076])

⁴³ supported by Cannon Point [FS22.012], supported in part by Meridian [FS47.163]

⁴⁴ [S288.046] (opposed by Forest & Bird [FS23.070]) and [S288.087] (opposed by Forest & Bird [FS23.111])

⁴⁵ [S193.068] (supported in part by Meridian [FS47.162], opposed by Forest & Bird [FS23.1024]) and [S193.120] (supported in part by Meridian [FS47.312], opposed by Forest & Bird [FS23.1076])

Sub-issue(s)	Description of matters raised by submitters
	<p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.025]⁴⁶ consider the objectives do not require the restrictive approach of Policy WH.P2 and consider the dual process for unplanned greenfield development is unwarranted as there is no such process in the RMA, seeking for Clause (g) of Policy WH.P2 to either be deleted or amended as follows:</p> <p style="text-align: center;"><i>(g) adopting best practice principles and management of soil conservation treatment, including revegetation with woody vegetation of land with high erosion risk,</i></p> <p>Southern North Island Wood Council [S262.013 and S262.018] seeks that replanting is not regulated in the plan.</p>
Oppose/amend requirements for farm environment plans	<p>WFF⁴⁷ seeks for Clause (h) of Policies WH.P2 and P.P2 to be deleted, for consistency with the WIP recommendations to provide incentives to assist implementation of existing national and regional regulations, and consistency with Method M12 of the NRP.</p> <p>CFG⁴⁸ suggests that their relief sought for Clause (f) of Policies WH.P2 and P.P2 can be applied for Clause (h) and seeks for consideration as such, noting that farm plans themselves are not actions that improve water quality, but are a means to describe good practice, regulations and actions to be applied to a site.</p>
Oppose the inclusion of forestry	<p>PF Olsen [S18.022 (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.058]) and S18.046] seeks for the exclusion of forestry activities from Policies WH.P2 and P.P2, and for clarification on the purpose of TAS which regulate forestry activities, noting the following:</p> <ul style="list-style-type: none"> • Considers that forestry activities are disproportionately restricted compared to pastoral activities, citing studies. • Questions restrictions on tree planting near water bodies, noting that research indicates trees to have positive impacts on water quality. • Further questions restrictions on non-take use of rainfall by commercial forestry compared to pasture, citing a local study. • Questions restrictions on reforestation in light of the rarity of landslides and debris flow in commercial forest settings in the Wellington region. • Cites studies which suggest that forests exhibit significant rainfall retention compared to pasture, acting as water storage during winter and releasing rainfall as low flows in drier months. • Seeks greater consistency and scientific evidence for proposed rules on forestry activities near water bodies. • Notes that the s32 report states that the NES-CF has not been taken into consideration. • Suggests a review of proposed legislative changes, to consider existing NES-CF regulations, research findings, and the impending National Framework. • Considers aligning policies with these standards will develop consistently aligned and sustainable policies for forestry activities in the region. <p>NZFFA⁴⁹ opposes policies WH.P2 and P.P2 as far as they relate to forestry.</p> <p>Southern North Island Wood Council [S262.013 and S262.018] seeks for the removal of Policies WH.P2 and P.P2 as far as they relate to forestry.</p>
Alignment with Taumata Arowai duties	<p>Taumata Arowai⁵⁰ seeks for provisions that interface with complementary Taumata Arowai duties and powers are well aligned, efficient and effective, and unnecessary duplication is avoided, noting the following:</p> <ul style="list-style-type: none"> • That policies and rules that establish requirements for wastewater and stormwater networks provide clarity to network operators and will have a bearing on the quality and quantity of contaminant discharge. • Suggests a solution may be signalling the relationship between different legislative requirements and how a single product (e.g. a stormwater management strategy) might be developed, reviewed and implemented, to meet both.
Amend for consistency with NZCPS	<p>The Minister of Conservation⁵¹ supports the intent of Policies WH.P2 and P.P2, however seeks for them to be amended to be consistent with Policy 23 of the NZCPS, with the following wording to be added:</p> <p style="text-align: center;"><i>Promoting design options that reduce flows to stormwater reticulation systems at source</i></p>
Further consideration of feasibility and costs	<p>NZTA [S275.012] (supported by WWL [FS39.105], opposed by Forest & Bird [FS23.706]) supports the intent of reducing contaminant loads, however considers it is unclear if and how the reduction can be sustained, noting further information should be provided before such targets are adopted. NZTA seeks for further consideration of the feasibility and costs of the targets of Policy P.P2, noting the following concerns regarding the sufficiency of the S32 assessment on economic costs.</p>

⁴⁶ supported by Cannon Point [FS22.012], supported in part by Meridian [FS47.163]

⁴⁷ [S193.068] (supported in part by Meridian [FS47.162], opposed by Forest & Bird [FS23.1024]) and [S193.120] (supported in part by Meridian [FS47.312], opposed by Forest & Bird [FS23.1076])

⁴⁸ [S288.046] (opposed by Forest & Bird [FS23.070]) and [S288.087] (opposed by Forest & Bird [FS23.111])

⁴⁹ [S195.035] (supported by NZCF [FS50.102], opposed by Forest & Bird [FS23.438]) and [S195.036] (supported by NZCF [FS50.103], opposed by Forest & Bird [FS23.439])

⁵⁰ [S116.029] (supported by Forest & Bird [FS23.597]) and [S116.081] (supported by Forest & Bird [FS23.649])

⁵¹ [S245.003] (supported by Forest & Bird [FS23.465], opposed in part by WIAL [FS31.022], with a neutral/not stated stance from WMNZ [FS46.048]) and [S245.019] (supported by Forest & Bird [FS23.481])

Issue 4: Policy WH.P4 and Table 8.5: Achievement of the visual clarity TAS

Sub-issue(s)	Description of matters raised by submitters
General support	<p>Yvonne Weeber⁵² and Guardians of the Bays⁵³ support Policy WH.P4 and Table 8.5, with no reasons stated or decision sought.</p> <p>Fish and Game [S188.042]⁵⁴ supports Policy WH.P4, with no reasons stated or decision sought.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.026] supports the proposed approach to achieving visual clarity targets, with specific respect to the Hutt River at Boulcott TAS site only, seeking for this visual clarity target to be retained as proposed.</p> <p>Pareraho Forest Trust [S213.018] seeks for Policy WH.P4 to be retained as notified, noting that lowering the Te Awa Kairangi lower mainstream load of 100kt/year by 24 percent will require action across all tributary catchments.</p> <p>EDS [S222.037]⁵⁵ supports Policy WH.P4 due to giving effect to the NPS-FM, with no specific decision sought.</p> <p>Forest & Bird [S261.065] (supported by MPHRCI [FS27.684], opposed by NZFFA [FS9.392]) supports meeting the direction of the NPS-FM and seeks for Policy WH.P4 to be retained as notified.</p> <p>Taranaki Whānui⁵⁶ seeks for Policy WH.P4 and Table 8.5 to be retained as notified, noting their support in principle.</p>
Shorten timeframes	<p>EDS [S222.038]⁵⁷ seeks for the 2040 timeframe to be amended to 2040 to address the urgency of freshwater and biodiversity issues.</p> <p>Forest & Bird [S261.066]⁵⁸ seeks either for the timeframes to be shortened to 2030, or for interim goals to be provided, noting the NPS-FM requires interim timeframes for TAS of no more than 10 years.</p>
Extend timeframes	<p>WCC⁵⁹ seeks for the timeframe to be amended from 2040 to 2060, noting that the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of WCC, suggesting the 2060 timeframe is consistent with WCC's spatial planning framework, and more consistent with the long-term plan and strategic financing of upgrades and expansions to the three waters network.</p> <p>WWL⁶⁰ seeks for the timeframes in Objective WH.P4 and Table 8.5 to be amended to 2060.</p> <p>Kāinga Ora [S257.012 and S257.013] generally supports Policy WH.P4 and Table 8.5, however seeks amendments to reflect an extended timeline for the achievement of TAS, taking into consideration the feasibility and cost of achieving the prescribed timeframes.</p> <p>UHCC [S225.069] (opposed by Forest & Bird [FS23.897]) supports the intent of Policy WH.P4, however raises concern that it may be too ambitious to achieve, seeking for interim targets to be introduced rather than working towards a short timescale.</p>
Oppose/amend TAS	<p>Withdraw</p> <p>WWL⁶¹ seeks for Policy WH.P4 and Table 8.5 to be withdrawn until further detail is added, noting their other relief sought for Policy WH.P4 and Table 8.5 (refer <i>extend timeframes</i> and <i>set TAS for visual clarity and deposited sediment...</i> sub-issues).</p> <p>WFF⁶² seeks for the deletion of Clauses (a), (b) and Table 8.5, noting the following concerns:</p> <ul style="list-style-type: none"> • That there is insufficient evidence to support the proposed reductions.

⁵² [S183.193] (supported by MPHRCI [FS27.193]) and [S183.194] (supported by MPHRCI [FS27.194])

⁵³ [S186.105] (supported by MPHRCI [FS27.528]) and [S186.106] (supported by MPHRCI [FS27.529])

⁵⁴ supported by Forest & Bird [FS23.1198], MPGC [FS21.047] and MPHRCI [FS27.1131], opposed by NZFFA [FS9.042]

⁵⁵ supported by Forest & Bird [FS23.193] and MPHRCI [FS27.929], opposed by NZFFA [FS9.218]

⁵⁶ [S286.034] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.031] and Rangitāne [FS24.034]) and [S286.035] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.032] and Rangitāne [FS24.035])

⁵⁷ supported by Forest & Bird [FS23.194] and MPHRCI [FS27.930], opposed by NZFFA [FS9.219], Winstone Aggregates [FS8.015] and WWL [FS39.013]

⁵⁸ supported by MPHRCI [FS27.685], opposed by NZFFA [FS9.393] and WWL [FS39.063]

⁵⁹ [S33.038] (supported by WWL [FS39.241]) and [S33.037] (supported by WWL [FS39.240])

⁶⁰ [S151.075] (opposed by Forest & Bird [FS23.1402]) and [S151.076] (supported by NZTA [FS28.141], opposed by Forest & Bird [FS23.1403])

⁶¹ [S151.075] (opposed by Forest & Bird [FS23.1402]) and [S151.076] (supported by NZTA [FS28.141], opposed by Forest & Bird [FS23.1403])

⁶² [S193.070] (opposed by Forest & Bird [FS23.1026]) and [S193.071] (opposed by Forest & Bird [FS23.1027])

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> • That national bottom lines are aspirational, including for Makara and Mangaroa. • That baseline sediment loads are uncertain. <p>Consider all contributing sediment sources WWL⁶³ seeks for Objective WH.P4 and Table 8.5 to be amended to set TAS for visual clarity and deposited sediment by taking into consideration all contributing sediment sources and addressing the following:</p> <ul style="list-style-type: none"> • How sediment load reductions will be measured in the future. • How proportionate contribution to sediment, and any reduction in contributions, will be measured. <p>Add clause directing sediment source studies In addition to their relief sought for Policy WH.P4 and Table 8.5, WFF [S193.070] (opposed by Forest & Bird [FS23.1026]) seeks for the addition of a clause to Policy WH.P4 which directs sediment source studies to establish fit for purpose information on relative sources and spatial-temporal patterns, including consideration of natural factors impacting clarity (e.g. Mangaroa/peat, Pauhatanui/soft-bottom substrate) and to help identify and prioritise catchments/actions.</p> <p>Revise TAS in accordance with NPS-FM Clause 3.11(8) PF Olsen [S18.024 and S18.025] seeks for Policy WH.P4 to be amended to incorporate a new table wherein TAS are revised in accordance with Clause 3.11(8) of the NPS-FM, noting the following concerns:</p> <ul style="list-style-type: none"> • A lack of due consideration given to the environmental outcomes, TAS of receiving environments, and connections between water bodies, as required by the clause. • Questions the effectiveness of the proposed TAS and considers that they do not reflect an adequate understanding of environmental outcomes. • Questions the use of freshwater accounting systems to inform the setting of TAS and emphasises the importance of accurate and up-to-date information. <p>Amend TAS to reflect naturally occurring inputs NZFFA Wellington [S36.038] considers the TAS for Mangaroa are inappropriate, noting the required clarity is affected by naturally occurring input from a major peat swamp. NZFFA Wellington also question the target for Wainuiomata urban stream/Black Creek, noting it may also be subject to natural brown water. NZFFA seek for the TAS to be amended accordingly.</p>
Insufficient water quality monitoring	CFG [S288.048] (opposed by Forest & Bird [FS23.072]) does not object to the aggregated outcome reflected at the water quality monitoring site, however considers there is insufficient water quality monitoring in the wider sub-catchment to determine the primary cause of poor clarity and therefore considers the action to achieve the outcome may be mistargeted.

⁶³ [S151.075] (opposed by Forest & Bird [FS23.1402]) and [S151.076] (supported by NZTA [FS28.141], opposed by Forest & Bird [FS23.1403])

Issue 5: Policy P.P4, Table 9.3 and Table 9.4: Contaminant load reductions

Sub-issue(s)	Description of matters raised by submitters
General support	<p>WCC [S33.085] supports the reduction of contaminants provided the timeframes are reasonable and practicable, and seeks for Policy P.P4 to be retained as notified provided WCC’s relief sought for Table 9.3 is accepted (refer <i>extend timeframes</i> sub-issue).</p> <p>Yvonne Weeber⁶⁴ supports Policy P.P4, Table 9.3 and Table 9.4 with no reasons stated or decision sought.</p> <p>Fish and Game [S188.076]⁶⁵ supports Policy P.P4, with no reasons stated or decision sought.</p> <p>PCC [S240.035] (opposed by NZFFA [FS9.132]) supports the reduction in annual sediment load in principle and seeks for Policy P.P4 to be retained as notified.</p>
Shorten/include timeframes	<p>EDS [S222.082]⁶⁶ seeks for the Table 9.3 timeframe to be amended to 2040 to address the urgency of freshwater and biodiversity issues.</p> <p>Forest & Bird⁶⁷ seek for the Table 9.3 targets to be set for 2030; if the date is to remain at 2040, Forest & Bird seek for interim states to be set at no longer than 10-year intervals. Additionally, Forest & Bird [S261.146]⁶⁸ seek for the inclusion of a timeframe for Table 9.4.</p>
Extend timeframes	<p>WCC⁶⁹ seek for the timeframes for Tables 9.3 and 9.4 to be amended from 2040 to 2060, noting that the 2040 timeframe will be difficult to achieve and does not take into account the environmental and financial constraints of WCC, suggesting the 2060 timeframe is consistent with WCC's spatial planning framework, and more consistent with the long-term plan and strategic financing of upgrades and expansions to the three waters network.</p> <p>WWL⁷⁰ seeks for the timeframes in Policy P.P4 and Table 9.3 to be amended to 2060.</p> <p>Kāinga Ora [S257.042 and S257.043] generally supports Policy P.P4 and Table 9.3, however seeks amendments to reflect an extended timeline for the achievement of TAS, taking into consideration the feasibility and cost of achieving the prescribed timeframes.</p>
Withdraw	<p>WFF⁷¹ seeks for the deletion of Clauses (a) and (b) and Tables 9.3 and 9.4, noting that there is insufficient evidence to support the proposed reductions.</p> <p>WWL⁷² seeks for Tables 9.3 and 9.4 to be withdrawn until further details is added, noting their other relief sought for Policy P.P4 and Tables 9.3 and 9.4 (refer <i>extend timeframes</i> and <i>consider all contributing sediment sources</i> sub-issues).</p>
Consider all contributing sediment sources	<p>WWL [S151.112] (supported by NZTA [FS28.169], opposed by Forest & Bird [FS23.1439]) seeks for Table 9.4 to be amended to set TAS for visual clarity and deposited sediment by taking into consideration all contributing sediment sources and addressing the following:</p> <ul style="list-style-type: none"> • How sediment load reductions will be measured in the future. • How proportionate contribution to sediment, and any reduction in contributions, will be measured.
Direct sediment source studies	<p>WFF [S193.122] (opposed by Forest & Bird [FS23.1078]) seeks for the addition of a clause to Policy P.P4 which directs sediment source studies to establish fit-for-purpose information on relative sources and spatial-temporal patterns, including consideration of natural factors impacting clarity, and to help identify and prioritise catchments/actions.</p>
Oppose use of stormwater controls	<p>Pukerua Property Group [S241.024] (supported in part by Land Matters [FS13.025 and FS13.047]) and Land Matters [S243.012] consider the use of stormwater control to effectively manage or prevent land use is inconsistent with integrated management principles of the RMA and seek the deletion of Policy P.P4. If the policy is not deleted, Pukerua Property Group and Land matters seek amendments to provide opportunities for development within Porirua Whaitua. Specifically, the removal of avoidance principles, to be replaced with the same effect/guidance as the remainder of the NRP before notification, with consideration for policy relief for activities that require consent under the operative provisions.</p>
Revise TAS in accordance with	<p>PF Olsen [S18.048, S18.049 and S18.050] seeks for the Tables 9.3 and 9.4 TAS to be revised in accordance with Clause 3.11(8) of the NPS-FM as well as amendments to Objective WH.O5 as appropriate, noting the following:</p>

⁶⁴ [S183.277] (supported by MPHRCI [FS27.277]), [S183.278] (supported by MPHRCI [FS27.278]) and [S183.279] (supported by MPHRCI [FS27.279])

⁶⁵ supported by Forest & Bird [FS23.1232], MGC [FS21.081] and MPHRCI [FS27.1165], opposed by NZFFA [FS9.076]

⁶⁶ supported by Forest & Bird [FS23.238] and MPHRCI [FS27.974], opposed by Kāinga Ora [FS45.025], NZFFA [FS9.263] and WWL [FS39.018]

⁶⁷ [S261.144] (supported by MPHRCI [FS27.763], opposed by NZFFA [FS9.471] and WWL [FS39.067]) and [S261.145] (supported by MPHRCI [FS27.764], opposed by NZFFA [FS9.472] and WWL [FS39.068])

⁶⁸ supported by MPHRCI [FS27.765], opposed by NZFFA [FS9.473] and WWL [FS39.069]

⁶⁹ [S33.086] (supported by WWL [FS39.246]) and [S33.087] (supported by WWL [FS39.247])

⁷⁰ [S151.110] (opposed by Forest & Bird [FS23.1437]) and [S151.111] (opposed by Forest & Bird [FS23.1438])

⁷¹ [S193.122] opposed by Forest & Bird [FS23.1078]), [S193.123] (opposed by Forest & Bird [FS23.1079]) and [S193.124] (opposed by Forest & Bird [FS23.1080])

⁷² [S151.111] (opposed by Forest & Bird [FS23.1438]) and [S151.112] (supported by NZTA [FS28.169], opposed by Forest & Bird [FS23.1439])

Sub-issue(s)	Description of matters raised by submitters
NPS-FM Clause 3.11(8)	<ul style="list-style-type: none"> • Considers insufficient consideration has been given to the environmental outcomes, TAS of receiving environments and connections between water bodies as required by Clause 3.11(8). • Questions the effectiveness of the proposed TAS and considers they do not reflect an adequate understanding of environmental outcomes. • Questions the use of freshwater accounting systems to inform the setting of TAS and emphasises the importance of accurate and up-to-date information.
Amend for consistency with NZCPS	The Minister of Conservation [S245.020] (supported by Forest & Bird [FS23.482]) supports the intent of Policy P.P4, however seeks for it to be amended for consistency with Policy 23 of the NZCPS.
Further consideration of feasibility and costs	NZTA [S275.013] (supported by WWL [FS39.106], opposed by Forest & Bird [FS23.707]) supports the intent of reducing contaminant loads, however considers it is unclear if and how the reduction can be sustained, noting further information should be provided before such targets are adopted. NZTA seeks for further consideration of the feasibility and costs of the targets of Policy P.P2, noting the following concerns regarding the sufficiency of the S32 assessment on economic costs.
Clarify if “land use” includes urban land use	CFG [S288.089] (opposed by Forest & Bird [FS23.113]) seeks clarification on whether “land use” includes urban land use.

Issue 6: Not applicable to whitua

Sub-issue(s)	Description of matters raised by submitters
Policy P30	<p>General support Lynn Cadenhead [S22.016] and Guildford Timber, Silverstream Forest and Goodwin Estate [S210.017] support Policy P30 and seek that it is retained as notified.</p> <p>Yvonne Weeber [S183.096] (supported by MPHRCI [FS27.096]), Guardians of the Bays [S186.043] (supported by MPHRCI [FS27.466]) and Fish and Game [S188.020] (supported by Forest & Bird [FS23.1176], MPGC [FS21.025] and MPHRCI [FS27.1109], opposed by NZFFA [FS9.020]) support Policy P30 with no reasons stated or decision sought.</p> <p>Retain application to whitua Should WIAL's [S101.031] (opposed by Forest & Bird [FS23.1284]) relief sought for Chapter 8 of the NRP not be accepted, WIAL seeks for the deletion of the proposed note in Policy P30 which excludes the application of the objective and Tables 3.7 and 3.8 to Whaitua Te Whanganui-a-Tara.</p> <p>Should WIAL's [S101.001] (opposed by Forest & Bird [FS23.1254]) relief sought for Chapter 8 of the NRP not be accepted, WIAL opposes the exclusion of Policy P30(b) as it relates to Whaitua Te Whanganui-a-Tara, and seeks for its applicability to the whitua to be retained.</p>
Policy P36	<p>General support Yvonne Weeber [S183.097] (supported by MPHRCI [FS27.097]) and Guardians of the Bays [S186.044] (supported by MPHRCI [FS27.467]) support the policy with no reasons stated or decision sought.</p> <p>Include Wellington Harbour Sofia Holloway [S13.002] seeks for the inclusion of Wellington Harbour (Port Nicholson) in Policy P36, requesting it to be amended to the following wording:</p> <p style="text-align: center;"><i>Policy P36: Restoring Te Awarua-o-Porirua Harbour, Wellington Harbour (Port Nicholson) and Wairarapa Moana The ecological health and significant values of Te Awarua-o-Porirua Harbour, Wellington Harbour (Port Nicholson) and Wairarapa Moana will be restored including by:</i></p> <p>Retain application to whitua Should WIAL's [S101.032] (opposed by Forest & Bird [FS23.1285]) relief sought for Chapter 8 of the NRP not be accepted, WIAL opposes the exclusion of Policy P36 to Wellington Harbour, and seeks for the proposed amendments to be deleted.</p>
Policy P45	<p>General support Fish and Game [S188.021] (supported by Forest & Bird [FS23.1177], MPGC [FS21.026] and MPHRCI [FS27.1110], opposed by NZFFA [FS9.021]) supports the policy with no reasons stated or decision sought.</p> <p>General oppose Yvonne Weeber [S183.098] (supported by MPHRCI [FS27.098]) opposes the policy, noting that trout are an invasive introduced species.</p>

Sub-issue(s)	Description of matters raised by submitters
Policy P65	Yvonne Weeber [S183.078] (supported by MPHRCI [FS27.078]) and Guardians of the Bays [S186.032] (supported by MPHRCI [FS27.455]) support the policy with no reasons stated or decision sought.
Policy P77	<p>General support Yvonne Weeber [S183.085] (supported by MPHRCI [FS27.085]) supports the policy with no reasons stated or decision sought.</p> <p>Retain application to whitua Should WIAL's [S101.026] (opposed by Forest & Bird [FS23.1279]) relief sought for Chapter 8 of the NRP not be accepted, WIAL opposes the exclusion of Policy P77 as it relates to Whitua Te Whanganui-a-Tara, and seeks for its applicability to the whitua to be retained.</p> <p>WFF [S193.035] (supported by Meridian [FS47.139], opposed by Forest & Bird [FS23.991]) seeks for the policy to be retained for all whitua.</p>

Appendix 2.1: Submission points allocated to multiple sub-issues

Submission point	Submitter name	Issue	Sub-issues
S151.072	Wellington Water Ltd	Issue 1: Policies WH.P1 and P.P1 – Improvement of aquatic ecosystem health	<ul style="list-style-type: none"> • General support • Improve or enhance only where required • Clarify "work programmes"
S151.108	Wellington Water Ltd	Issue 1: Policies WH.P1 and P.P1 – Improvement of aquatic ecosystem health	<ul style="list-style-type: none"> • General support • Improve or enhance only where required • Clarify "work programmes"
S206.035	Winstone Aggregates	Issue 1: Policies WH.P1 and P.P1 – Improvement of aquatic ecosystem health	<ul style="list-style-type: none"> • Improve or enhance only where required • Enable work programmes that seek to improve aquatic ecosystem health
S206.063	Winstone Aggregates	Issue 1: Policies WH.P1 and P.P1 – Improvement of aquatic ecosystem health	<ul style="list-style-type: none"> • Improve or enhance only where required • Enable work programmes that seek to improve aquatic ecosystem health
S261.063	Forest & Bird	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose financial contributions as an offset • Include reference to ephemeral watercourses, wetlands and estuaries • Clarify scope for management of rural land use
S261.142	Forest & Bird	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose financial contributions as an offset • Include reference to ephemeral watercourses, wetlands and estuaries • Clarify scope for management of rural land use
S151.073	Wellington Water Ltd	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Clarify interactions between provisions • Oppose/amend reduction of urban contaminant load (Clause (b)) - Amend to encourage reduction of urban contaminant load where appropriate • Oppose hydrological controls (Clause (c))
S151.109	Wellington Water Ltd	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Clarify interactions between provisions • Oppose/amend reduction of urban contaminant load (Clause (b)) - Amend to encourage reduction of urban contaminant load where appropriate • Oppose hydrological controls (Clause (c))
S101.043	Wellington International Airport Limited	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Clarify freshwater TAS versus coastal water objectives • Clarify scope of Clause (a) • Oppose prohibited activity status (Clause (a)) • Oppose/amend reduction of urban contaminant load (Clause (b)) - Unclear what methods "encourage" redevelopment of existing urban areas • Oppose hydrological controls (Clause (c))
S210.025	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Identify targets for non-TAS matters • Oppose prohibited activity status (Clause (a)) • Amend requirement for active management (Clause (f)) • Oppose/amend requirement to revegetate with woody vegetation (Clause (g))
S206.036	Winstone Aggregates	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose prohibited activity status (Clause (a)) • Amend riparian margin planting requirements (Clause (e))
S206.064	Winstone Aggregates	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose prohibited activity status (Clause (a)) • Amend riparian margin planting requirements (Clause (e))
S211.010	Hutt City Council	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose prohibited activity status (Clause (a)) • Oppose/amend reduction of urban contaminant load (Clause (b))
S240.033	Porirua City Council	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose prohibited activity status (Clause (a)) • Oppose/amend reduction of urban contaminant load (Clause (b))

Submission point	Submitter name	Issue	Sub-issues
S33.035	Wellington City Council	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose prohibited activity status (Clause (a)) • Oppose hydrological controls (Clause (c)) • Recognise stormwater management strategies (Clause (d))
S33.083	Wellington City Council	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose prohibited activity status (Clause (a)) • Oppose hydrological controls (Clause (c)) • Recognise stormwater management strategies (Clause (d))
S226.004	Higgins Contractors Limited	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose hydrological controls (Clause (c)) • Remove requirement to reduce contaminant loads from stormwater networks (Clause (d))
S16.009	Pauatahanui Residents Association	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Achieve objectives through non-regulatory methods •
S193.068	Wairarapa Federated Farmers	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Amend riparian margin planting requirements (Clause (e)) • Amend requirement for active management (Clause (f)) • Oppose/amend requirement to revegetate with woody vegetation (Clause (g)) • Oppose/amend requirements for farm environment plans
S193.120	Wairarapa Federated Farmers	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Amend riparian margin planting requirements (Clause (e)) • Amend requirement for active management (Clause (f)) • Oppose/amend requirement to revegetate with woody vegetation (Clause (g)) • Oppose/amend requirements for farm environment plans
S262.013	Southern North Island Wood Council	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose/amend requirement to revegetate with woody vegetation (Clause (g)) • Oppose the inclusion of forestry
S262.018	Southern North Island Wood Council	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Oppose/amend requirement to revegetate with woody vegetation (Clause (g)) • Oppose the inclusion of forestry
S288.046	China Forest Group Company New Zealand Ltd	Issue 2: Policies WH.P2 and P.P2 – Management of activities to achieve TAS and coastal water objectives	<ul style="list-style-type: none"> • Amend requirement for active management (Clause (f)) • Oppose/amend requirements for farm environment plans
S151.075	Wellington Water Ltd	Issue 3: Policy WH.P4 and Table 8.5: Achievement of the visual clarity TAS	<ul style="list-style-type: none"> • Extend timeframes • Oppose/amend TAS – Withdraw • Oppose/amend TAS - Consider all contributing sediment sources
S151.076	Wellington Water Ltd	Issue 3: Policy WH.P4 and Table 8.5: Achievement of the visual clarity TAS	<ul style="list-style-type: none"> • Extend timeframes • Oppose/amend TAS – Withdraw • Oppose/amend TAS - Consider all contributing sediment sources
S193.070	Wairarapa Federated Farmers	Issue 3: Policy WH.P4 and Table 8.5: Achievement of the visual clarity TAS	<ul style="list-style-type: none"> • Oppose/amend TAS – Withdraw • Oppose/amend TAS - Add clause directing sediment source studies
S151.112	Wellington Water Ltd	Issue 4: Policy P.P4, Table 9.3 and Table 9.4: Contaminant load reductions	<ul style="list-style-type: none"> • Withdraw • Consider all contributing sediment sources
S193.122	Wairarapa Federated Farmers	Issue 4: Policy P.P4, Table 9.3 and Table 9.4: Contaminant load reductions	<ul style="list-style-type: none"> • Withdraw • Direct sediment source studies